



# AMERICAN MEDIA INSTITUTE EMPLOYEE HANDBOOK

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# **AMERICAN MEDIA INSTITUTE EMPLOYEE HANDBOOK**

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## FOREWORD

American Media Institute (“AMI” or “the Company”) is a nonprofit organization dedicated to educating the public on important current events through investigative journalism.

Whether you have just joined our staff or have been at American Media Institute for a while, we are confident that you will find American Media Institute a dynamic and rewarding place in which to work and we look forward to a productive and successful association. We consider the employees of American Media Institute to be among our most valuable resources.

This manual has been written to serve as a guide for the employer/employee relationship. There are several important things to keep in mind about this handbook.

First, it contains only general information and guidelines. It is not intended to be comprehensive or to address all the possible applications of, or exceptions to, the general policies and procedures described. For that reason, if you have any questions concerning eligibility for a particular benefit or the applicability of a policy or practice to you, please address your specific questions to your supervisor or American Media Institute Management. Neither this handbook nor any other Company document, confers any contractual right, either express or implied, to remain in the Company's employ. Nor does it guarantee any fixed terms and conditions of employment. Employment may be terminated at will, with or without cause, and without prior notice, by the Company for any reason at any time.

Second, the procedures, practices, policies and benefits described here may be modified or discontinued from time to time. We will endeavor to inform you of any changes as they occur.

Third, this handbook and the information in it should be treated as secret and confidential. No portion of this handbook should be disclosed to others, except American Media Institute employees and others affiliated with American Media Institute whose knowledge of the information is required in the normal course of business or internal policies are part of our “secret sauce” and part of our

competitive advantage.

Finally, some of the subjects briefly summarized here are covered in detail in other official policy documents, which are generally available on the company website. Search “policies” or “transparency”. Refer to these documents for specific information.

**RECEIPT FOR EMPLOYEE HANDBOOK**

I acknowledge that I have received a copy of American Media Institute's Employee Handbook. I agree to read it thoroughly, including the statements in the foreword, which describe the purpose and effect of the Handbook. I agree that if there is any policy or provision in the Handbook that I do not understand, I will seek clarification from American Media Institute Management. I understand that American Media Institute is an "at will" employer and therefore employment with American Media Institute is not for a fixed term or definite period and may be terminated at the will of either party, with or without cause, and without prior notice. In addition, I understand that this Handbook states American Media Institute 's policies and practices in effect on the date of publication. I understand that nothing contained in the Handbook may be construed as creating a promise of future benefits or a binding contract with American Media Institute for benefits or for any other purpose. I also understand that these policies and procedures are continually evaluated and may be amended, modified or terminated at any time. Please sign and date this receipt and return it to American Media Institute Management.

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_



## **INTRODUCTION**

### **EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT**

Equal Employment Opportunity is a fundamental principle at American Media Institute, where employment is based upon merit, achievement and qualifications without discrimination based on race, color, creed, religion, sex, age, national origin, disability, or any other protected characteristic as established by law.

This policy of Equal Employment Opportunity applies to all policies and procedures relating to recruitment and hiring, compensation, benefits, termination and all other terms and conditions of employment.

The American Media Institute Management has overall responsibility for this policy and maintains reporting and monitoring procedures. Employees' questions or concerns should be referred to American Media Institute Management.

Appropriate disciplinary action may be taken against any employee who willfully violates this policy.

### **NONDISCRIMINATION AND ANTI-HARASSMENT POLICY**

American Media Institute is committed to a work environment in which all individuals can thrive and be treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, American Media Institute expects that all relationships among persons in the workplace will be businesslike and free of bias, prejudice and harassment.

#### **Equal Employment Opportunity**

It is the policy of American Media Institute to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, national origin, religion, sex, age, disability, alienage or citizenship status, marital

status, creed, genetic predisposition or carrier status, sexual orientation or any other characteristic protected by law. American Media Institute prohibits and will not tolerate any such discrimination or harassment.

## **Definitions of Harassment**

1. Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, sexual harassment is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example: (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; ii) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (iii) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment may include a range of subtle and not so subtle behaviors and may involve individuals of the same or different sexes. Depending on the circumstances, these behaviors may include, but are not limited to: unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, catcalls or touching; insulting or obscene comments or gestures; display or circulation in the workplace of sexually suggestive objects or pictures (including through email); and other physical, verbal or visual conduct of a sexual nature. Sex-based harassment, that is, harassment not involving sexual activity or language (e.g., male manager yells only at female employees and not males), may also constitute discrimination if it is severe or pervasive and directed at employees because of his or her sex.

2. Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, national origin, age, disability, alienage or citizenship status, marital status, creed, genetic predisposition or carrier status, sexual orientation

or any other characteristic protected by law or toward his/her relatives, friends or associates, and that: (i) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (ii) has the purpose or effect of unreasonably interfering with an individual's work performance; or (iii) otherwise adversely affects an individual's employment opportunities. Harassing conduct includes, but is not limited to: epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes and display; or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group (including through email).

### **Individuals and Conduct Covered**

These policies apply to all applicants and employees, and prohibit harassment, discrimination and retaliation whether engaged in by fellow employees, by a supervisor or manager or by someone not directly connected to American Media Institute (e.g., an outside vendor, consultant or customer). Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

### **Retaliation Prohibited**

American Media Institute prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports. Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action.

### **Complaint Procedure**

1. Reporting an Incident of Harassment, Discrimination or Retaliation:  
American Media Institute strongly urges the reporting of all incidents of discrimination, harassment or retaliation, regardless of the offender's

identity or position. Individuals who believe they have experienced conduct contrary to American Media Institute 's policy or who have concerns about such matters should file their complaints with the Director of Human Resources before the conduct becomes severe or pervasive.

**IMPORTANT NOTICE TO ALL EMPLOYEES:**

*Employees who have experienced conduct they believe is contrary to this policy have an obligation to take advantage of this complaint procedure. An employee's failure to fulfill this obligation could affect his or her rights in pursuing legal action. Also, please note that federal, state and local discrimination laws establish specific time frames for initiating a legal proceeding pursuant to those laws.*

Early reporting and intervention have proved the most effective methods of resolving actual or perceived incidents of harassment.

Therefore, while no fixed reporting period has been established, American Media Institute strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken. American Media Institute will make every effort to stop alleged harassment before it becomes severe or pervasive, but can do so only with the cooperation of its staff/employees.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to harassing conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it be discontinued.

**2. Investigation of Complaints:** Any reported allegations of harassment, discrimination or retaliation will be investigated promptly, thoroughly and impartially. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who have observed the alleged conduct or have other relevant knowledge.

Confidentiality will be maintained throughout the investigatory process to the

extent consistent with adequate investigation and appropriate corrective action.

**3. Responsive Action:** Misconduct constituting harassment, discrimination or retaliation will be dealt with promptly and appropriately. Responses may include: training, referral to counseling, monitoring of the offender and/or disciplinary action such as a warning, a reprimand, withholding of a promotion or pay increase, reduction of wages, demotion, reassignment, temporary suspension without pay or termination, as American Media Institute determines appropriate under the circumstances.

Finally, these policies may not be used as a basis for excluding or separating individuals of a particular sex, or any protected characteristic, from participating in business or work-related social activities or discussions in order to avoid allegations of harassment. The law and the policies of American Media Institute prohibit disparate treatment on the basis of sex or any other protected characteristic with regard to terms, conditions, privileges and perquisites of employment. The prohibitions against harassment, discrimination and retaliation are intended to complement and further these policies, not to form the basis of an exception to them.

### **AMERICANS WITH DISABILITIES ACT POLICY STATEMENT**

American Media Institute is committed to complying with all applicable provisions of the Americans with Disabilities Act (ADA). It is the Company's policy not to discriminate against any qualified employee or applicant with regard to any terms or conditions of employment because of such individual's disability or perceived disability so long as the employee can perform the essential functions of the job. Consistent with this policy, the Company will provide reasonable accommodations to a qualified individual with a disability, as defined by the ADA, who has made the Company aware of his or her disability, provided that such accommodation does not constitute an undue hardship on the Company. Employees with a disability are encouraged to contact American Media Institute Management to request a reasonable accommodation that will allow them to perform the essential functions of their jobs.

## **Procedure for Requesting an Accommodation**

On receipt of an accommodation request, a member of American Media Institute Management and the appropriate supervisor will meet with the employee to discuss and identify the precise limitations imposed by the disability and the potential accommodation that American Media Institute might make to overcome those limitations. American Media Institute will determine the feasibility of these requests by considering various factors, including but not limited to: the nature and cost of the accommodation, the availability of tax credits and deductions and/or outside funding, American Media Institute 's overall financial resources, and the accommodation's impact on the Company's operation including its impact on the ability of other employees to perform their duties and on American Media Institute 's ability to conduct business.

American Media Institute will inform the employee of its decision on whether and how to make the accommodation. If the request is denied, employees will be advised of their right to appeal the decision by submitting a written statement explaining the reasons for the request. If the request is denied on appeal, that decision is final.

The ADA does not require American Media Institute to make the optimal accommodation, to reallocate essential job functions, or to provide personal use items (i.e., eyeglasses, hearing aids, wheelchairs, etc.). An employee or job applicant who has questions regarding this policy or believes that he or she has been discriminated against based on a disability should notify American Media Institute Management. All such inquiries or complaints will be treated as confidential to the extent permissible by law.

## **CONFIDENTIAL NATURE OF WORK**

All documents, records and information relating to American Media Institute or its customers or vendors or partners or consultants are confidential, and employees must treat them accordingly. No American Media Institute or American Media Institute -related information, including without limitation:

documents, notes, files, records, oral information, computer files or similar materials (except in the ordinary course of one's duties on behalf of American Media Institute) may be removed from American Media Institute 's premises without permission from American Media Institute. Additionally, the contents of American Media Institute 's records or information otherwise obtained in regard to business may not be disclosed to anyone, except where required for a business purpose. Employees must not disclose any confidential information, purposefully or inadvertently through casual conversation, to any unauthorized person inside or outside the Company. Employees who are unsure about the confidential nature of specific information must ask American Media Institute Management for clarification. Employees will be subject to appropriate disciplinary action, up to and including dismissal, for knowingly or unknowingly, revealing information of a confidential nature.

## **EMPLOYMENT**

### **EMPLOYEE CATEGORIES**

Employees of American Media Institute potentially fall into the following categories:

Full-Time

Part-Time

Temporary

#### **Full-Time**

An employee who works the standard Company working hours each week (for these purposes, 8 hours per day, 5 days per week) is considered full-time. Exempt employees are classified as such if their job duties are exempt from the overtime provisions of the Federal and State Wage and Hour Laws. Exempt employees are not eligible for overtime pay. Their salaries are calculated on a monthly basis.

Nonexempt employees receive overtime pay in accordance with our overtime policy. Their salaries are calculated on an hourly basis. As a practical matter, American Media Institute has no nonexempt full-time employees.

#### **Part-Time**

Part-time employees are classified as exempt or nonexempt and work a regular schedule of 20 hours or more, but less than 30 hours, per week. American Media Institute has no part-time employees.

#### **Temporary**

A temporary employee is hired for a specified project or time frame and works an irregular schedule of less than 20 hours per week. A temporary employee in a



nonexempt position is paid by the hour while a temporary employee in an exempt position is paid according to the terms of hire for that individual. Temporary employees do not receive any additional compensation or benefits provided by the Company. As a practical matter, American Media Institute has no nonexempt temporary employees or, in fact, any temporary employees of any kind.

## **COMPENSATION**

### **PERFORMANCE MANAGEMENT AND COMPENSATION PROGRAMS**

In order to attract and retain a highly qualified and skilled workforce, American Media Institute has instituted a performance management program to compensate employees in a fair and equitable manner based upon demonstrated job performance and in accordance with its Equal Employment Opportunity policy.

Through this program employees will receive constructive work reviews designed to address performance, skill, developmental needs and interests. Upon an employee's anniversary date, he or is eligible for a salary review.

### **PAYMENT OF SALARY**

Salary payment is made monthly for base salary due up to the pay date, which is the first of the following month. Overtime payment, which is included with the nonexempt employee's base salary payment, is also paid monthly and covers hours worked in the prior period. (For additional explanations see section on overtime policy and procedures.)

It is the Company's policy that employee paychecks will be given personally only to that employee. All other arrangements for mailing or pickup must be made in advance and in writing with the Chief Financial Officer (CFO), who may or may not approve such a request. Direct deposit paychecks shall solely go to accounts where the employee is listed by name.

If the normal payday falls on a Company-recognized holiday, paychecks will be distributed one workday after the aforementioned schedule. Under no circumstances will the Company release any paychecks before the announced schedule.

Employees may be paid by check or through direct deposit of funds to a

savings or a checking account at a designated bank (providing the bank has direct-deposit capability). To activate direct deposit, a Direct Deposit Authorization form may be obtained and completed by the bank. The completed form must then be returned to the CFO with a voided personal check. Due to banking requirements it may take several weeks for activation of Direct Deposit.

If a paycheck is lost, American Media Institute Management must be notified in writing as soon as possible before a replacement check can be issued. If the paycheck is recovered and the Company identifies the endorsement as that of the employee, the employee must remit the amount of the replacement check to the Company within 24 hours.

A statement of earnings is available to employees each pay period, indicating:

- Gross Pay

- Statutory Deductions

- Voluntary Deductions

The amount of Federal withholding is affected by the number of exemptions claimed on Form W-4, Employee's Withholding Allowance Certificate. If an employee's marital status changes or the number of exemptions grows or shrinks, a new Form W-4 must be submitted to the CFO.

Except in the case of genuine emergencies, no salary advances shall be made.

## **OVERTIME PAY**

Depending on Company work needs, employees must work overtime when requested to do so. Prior approval of a supervisor, however, is required before any nonexempt employee works overtime.

Nonexempt full-time employees are eligible for additional pay for work performed beyond their regularly scheduled 40 weekly hours. Hours at American

Media Institute are generally 10 a.m. to 6 p.m., Monday through Friday. As a practical and customary matter, many employees stay for later to consult with colleagues or complete projects. This is generally a voluntary decision.

After a nonexempt employee has worked the normal 40 hours, all additional time is paid at a rate of 1.5 times the employee's hourly rate. Nonexempt employees are responsible for calculating their own hours on a daily basis.

All employees are considered salaried and not eligible for overtime unless otherwise specified at the time of employment. However, if an employee is eligible for overtime, it must be preapproved. Additionally, time records with overtime must be co-signed by the supervisor and must be submitted to CFO by the 23rd of each month in order to be processed.

Exempt employees are not required to sign in or out; however, business trips, vacations, sick and personal days must be recorded with the employee designated to monitor attendance.

## **PERSONNEL RECORDS**

To keep necessary Company records up to date, it is extremely important that you notify American Media Institute Management of any changes in:

- Name and/or marital status
- Address and/or telephone number
- Number of eligible dependents
- W-4 deductions
- Emergency contact

## **CODE OF CONDUCT**

This Code of Conduct is intended to underpin our purpose. Each of us should strive to act in accordance with best business practices and highest ethical standards.

We must all remember that it is not only what we do that is important but also the way in which we do it.

Adherence to this code must not just be on our lips, but in our lives. How we act, individually and together, determines our ability to accomplish our company mission.

### **PURPOSE**

To ensure that the business conduct of American Media Institute employees is appropriate to, and in accordance with, American Media Institute's vision.

### **SCOPE**

This code of conduct applies to all employees of American Media Institute. All full-time, part-time, fixed-term and other temporary employees, and any contractor, agent, consultant or person acting for or on behalf of American Media Institute (hereinafter referred to as "employees"), are expected to adhere to this code of conduct.

### **RESPONSIBILITY**

All individuals must take personal responsibility for their own compliance. Managers should ensure that their employees understand this code.

### **BUSINESS BEHAVIORS**

American Media Institute expects from its employees, and all others that represent it, high standards of integrity and conduct in all matters. All employees

have an obligation to perform their duties and responsibilities to the best of their abilities, while conducting themselves and managing the business according to American Media Institute's vision.

## **Accountability**

American Media Institute expects all employees to take responsibility for their own actions.

## **Ethics**

American Media Institute expects all employees to conduct themselves in an ethical manner in their dealings on American Media Institute's behalf. Honesty, simplicity, clarity, and industriousness are key virtues.

## **Integrity**

American Media Institute expects high standards of behavior. We must be honest in our interactions with fellow employees, readers, listeners, subscribers, contributors, advertisers, customers and suppliers.

Although these behaviors apply equally to all employees, managers have the added responsibility of communicating them clearly to their teams.

## **POLICIES, PROCEDURES AND AUTHORITIES**

### **American Media Institute Policies**

This code of conduct reinforces existing policies and guidance already in place. These may include, but are not limited to:

- Anti-Bribery and Corruption Policy

- Entertainment and Gifts Policy
- Policy for Engaging with Third Parties
- Equal Opportunity Policy
- Information Security Policy
- Health and Safety Policy
- Disclosure Policy
- Promotions guidelines
- Travel and Expenses Policy
- Data Protection Policy

All employees should familiarize themselves with all relevant policies, codes and guidelines.

Moreover, in their areas of responsibility, managers should ensure that effective systems of internal control and accountability are established and followed by all employees, contractors, consultants or persons acting for or on behalf of American Media Institute.

## **EQUAL OPPORTUNITIES**

American Media Institute is an equal opportunity employer. Decisions on recruitment, promotion, salary increases, training and development, etc., must be made on merit, irrespective of sex, sexual orientation, disability, race, age, or any other unlawful factor.

American Media Institute gives full and fair consideration to suitable applications from all persons for employment. If existing employees become disabled, they will continue to be employed whenever possible. If it is deemed impractical for them to remain in their current positions, every reasonable effort will be made to find suitable alternative employment and to provide appropriate training.

Each member of the staff has a right to equality of opportunity and a duty to

comply with this policy. Breach of the Equal Opportunities Policy is a serious disciplinary matter.

American Media Institute is committed to ensuring that its workplaces operate within the framework of the law. Employees are expected to treat colleagues, customers and suppliers on merit irrespective of sex, sexual orientation, disability, race, age, or any other unlawful factor.

## **HEALTH AND SAFETY**

American Media Institute will not compromise health and safety in the workplace for any reason. The Health and Safety Policy applies across American Media Institute and ensures, wherever reasonably practicable, the health, safety and welfare of its employees and all others who could be affected by its activities. It is the responsibility of all employees to perform their duties while following the American Media Institute Health and Safety Policy as well as any local published health and safety rules, and to promptly report any concerns, safety violations or incidents, so that these may be resolved appropriately.

## **COMPLIANCE WITH THE LAW**

It is American Media Institute's policy to comply with the laws and regulations that apply to it, every where that it operates. Managers are responsible for ensuring that their subordinates have adequate knowledge of the laws governing their areas of operation. Compliance is a collective and individual responsibility that requires the cooperation and commitment of all employees. Every employee should take reasonable steps to complete training provided by the company. In addition, they must apprise managers about any additional legal and regulatory training requirements, which come to their attention.

Situations may arise in which the propriety of our practices is not clearly defined by such laws and regulations. As a general principle, if any doubt arises over whether a practice is compliant, it should not be pursued until clarification has been sought. Any ambiguities between the practices of American Media



Institute and such laws and regulations should first be referred to the General Counsel.

## **BRIBERY AND CORRUPTION LAWS**

Like all businesses based or doing business in the United States, American Media Institute is subject to the provisions of the U.S. Foreign Corrupt Practices Act. This law covers corruption and prohibits the giving or receiving of bribes or other improper inducements, including payments to both public officials and private sector personnel. Breach of this law can lead to serious civil and criminal sanctions on American Media Institute and on the individuals concerned.

American Media Institute is committed to avoiding bribery and corruption and to complying with bribery and corruption laws worldwide, as well as with those outlined in our own Policies and Procedures.

All American Media Institute employees (as defined above) must adhere to the Anti-Bribery and Corruption Policy and related procedures and must promptly report any concerns or violations. Compliance is a collective and individual responsibility that requires the cooperation and commitment of all employees. Managers are responsible for informing their subordinates about the relevant laws.

Failure to adhere to this guidance and to the Anti-Bribery and Corruption Policy and Procedures is a serious disciplinary matter.

## **ENTERTAINMENT AND GIFTS**

### **Purpose**

American Media Institute is committed to practicing journalism ethically and lawfully.

Consequently, the board of directors has established the following principles and requirements on the handling of entertainment and gifts to ensure that

these do not influence, or appear to influence, our decisions in reporting, editing, or conducting business with contractors or vendors. These principles apply to all our operations worldwide.

In addition, American Media Institute employees are expected to comply with any specific policies or guidelines which may apply inside a particular AMI division, including those which set financial limits on the value of entertainment or gifts which can be offered or accepted.

### **Scope and Responsibility**

This policy applies to all of us at American Media Institute, as well as to any third parties acting on our behalf, such as contractors, agents or intermediaries. We encourage our colleagues to notify us if they observe any breach of this policy, by raising the matter with their Manager or an appropriate Senior Executive, such as the General Counsel or Chief Operating Officer. Colleagues who report misconduct will be safeguarded from retribution or reassignment. Unless otherwise specified, "entertainment and gifts" refers to both those received and those offered.

### **General Principles**

Every part of American Media Institute's operations may find that occasional entertainment and gifts are an accepted and acceptable means of establishing and developing reporting sources or business relationships. This is expected, but must not be abused by spending American Media Institute funds on friends, family or others with whom American Media Institute is not doing business. Even when directed at appropriate recipients, entertainment and gifts should not be excessive or frequent.

American Media Institute employees and contractors may never accept or offer entertainment or gifts that could influence decisions, induce recipients to perform their functions improperly, or influence public officials. Nor should our employees offer or accept any entertainment or gifts that might appear inappropriate.

Employees will keep entertainment and gifts to reasonable and proportionate levels in terms of both frequency and value.

Because entertainment and gifts are customary in both journalism and other media businesses, their use is permissible if they are:

**1. Business-related:** Entertainment may be offered or received only when the event has a primarily business purpose, when employees are engaged in business discussions, and when the giver is present at the event.

**2. Reasonable, proportionate and appropriate:** Entertainment and gifts are gestures of courtesy and should not be disproportionate in value to the circumstances or inappropriate in nature.

**3. Occasional:** Business entertainment should not be received from, or offered to, the same organization or person on a regular basis. This could give rise to an actual or perceived cumulative effect of inducing the recipient to act improperly, or influence a public official.

**4. In-kind only:** Cash is never to be offered or received.

**5. Approved and registered:** Managers must provide written approval for the receipt or offer of entertainment and gifts, and evidence of this approval should be retained and readily available.

**6. Additional requirements:** Each unit shall maintain a Gifts Register except for gifts of low or nominal value (e.g., calendars, chocolates, flowers and branded promotional items).

Invoices or receipts are required for all gifts and entertainment expenses incurred.

**7. Bidding periods:** To avoid conflict of interest, employees or contractors must

not offer entertainment or gifts to, or accept them from, suppliers or vendors during periods when they are involved in contract negotiation.

**8. Discounted products and services:** Receiving or offering a product or service at a discounted rate for an individual's personal use is not permitted unless that discount is widely available to others.

**9. Spouses, partners and guests:** We acknowledge that some entertainment may include an invitation to bring a spouse, partner or guest to an event or activity, such as a business function or community event. In such situations, a Manager should provide written approval. Evidence of this approval should be retained on the share drive and readily available.

**10. Sports, cultural and other events:** Tickets to sports, cultural, and other events are permitted on an occasional basis. Manager approval should be obtained as described above. The giver (or the giver's organization) must be present at the event. Any related entertainment or hospitality must be proportionate and not at a level intended (or that could be perceived as intended) to induce the recipient to act improperly.

If the invitation to sports, cultural, or other event is offered by a team owner, executive, or sponsor of the event, and that owner is a past, current or potential donor to American Media Institute, this rule does not apply.

**11. Management responsibility and approval of exceptions:** Each Manager is responsible for approving or denying entertainment and gifts and is required to provide written consent. For costly or unusual gifts and entertainment and for cases considered borderline, a Senior Executive must provide written approval. If there is any remaining uncertainty over the appropriateness of the entertainment or gift, please consult who will provide a signed letter stating his approval or disapproval.

**12. Consequences of Noncompliance:** Failure to adhere to this policy or to any applicable guidelines may result in disciplinary action, up to and including dismissal.

American Media Institute may also seek to terminate its commercial relationships with third parties who engage in bribery or corruption

## **INFORMATION SECURITY AND DATA PROTECTION**

During employment with American Media Institute employees may have access to confidential information relating to American Media Institute or to companies or individuals connected with American Media Institute. This includes but is not limited to commercially sensitive data and personal data regarding employees, readers, listeners, subscribers, contributors, advertisers, subjects of reporting investigations, customers, or suppliers (including debit or credit card data).

### **Information Security**

All employees are responsible for the security of any data to which they have access. Employees must not use, disclose or cause the disclosure of any such information (other than in the course of their duties) during their employment or afterward without prior consent. Consent may come from a senior manager or the General Counsel where appropriate. All employees must perform their duties while following American Media Institute's Information Security Policy and any local published information security rules.

Access to American Media Institute's information and records is restricted to those employees with proper authorization and legitimate business needs.

For example:

- Desks should be kept as clear as possible
- Confidential files should be locked away when not in use
- Confidential documents put in document destruction bin
- Electronic information security techniques employed.

Information held on laptops should be similarly protected, particularly when laptops or other portable storage devices are taken outside the office. Additionally, employees should take great care when discussing or viewing in

public places any confidential information obtained during employment.

## **Data Protection**

There are many rules regarding the use and processing of personal data by companies and their employees and significant criminal sanctions for failure to comply.

Employees must perform their duties while following the published Data Protection rules or policies and must promptly report any concerns or violations.

The Data Protection Policy applies to all information held by American Media Institute, whether in hard copy or electronic form (including the contents of emails), and whether the data concerns employees, readers, listeners, subscribers, contributors, advertisers, subjects of reporting, suppliers, customers, the general public or any other third party.

If American Media Institute discovers a breach of the security of confidential information, it shall advise competent local and law enforcement authorities and promptly notify all stakeholders whose personal information was breached. Notification shall be made as promptly as possible, consistent with the legitimate needs of law enforcement and with any measures necessary to determine the scope of the breach and restore reasonable integrity to the data security system.

If pursuant to this section, American Media Institute is required to notify more than 1,000 persons of a security breach, American Media Institute shall also notify, without unreasonable delay, all consumer reporting agencies that compile and maintain files on consumers on a nationwide basis, as defined by section 603(p) of the Fair Credit Reporting Act (15 U.S.C. § 1681a(p)), of the timing, distribution and content of the notices.

Further information on these policies can be obtained from the General Counsel.

## **CONTENT AND INTELLECTUAL PROPERTY PROTECTION**

We are a content producer. Protection of American Media Institute's content and intellectual property is a key element of its success. The following sections outline American Media Institute's expectations in this area:

### **Content**

AMI is committed to ensuring that the content it publishes (whether in hard copy or electronic form) or broadcasts, complies with relevant style and content guidelines, as well as with publishing and broadcasting standards. Employees must, therefore, take reasonable steps to comply with all relevant codes and standards that apply. (See below.)

### **Intellectual Property, Including Copyright**

Any interests in copyrights, trademarks, patents, patent applications, inventions, developments and processes developed by American Media Institute's employees in the course of their employment that relate to American Media Institute's business belong to the company unless otherwise stated.

As well as protecting American Media Institute's intellectual property, it is the policy of American Media Institute to respect the legitimate copyright of other intellectual property owners.

### **Software Copyright**

American Media Institute requires all software installed on its computer equipment to be properly licensed. All obligations imposed by the vendors of software and by national laws must be adhered to at all times.

Both the Chief Information Officer (CIO) and the CFO shall maintain a central

reposition of all software licenses for all users, throughout the company, at all times.

## **AUDIENCE MEASUREMENT (Audience Audits)**

American Media Institute tracks and analyzes the impact of all of its articles, broadcasts, podcasts, and other products. These reports are usually summarized in a document called "Audience Audit".

American Media Institute is committed to the accuracy of its audience figures through adherence to relevant industry rules, guidelines, local policies and accepted best practices. Audience figures should never be intentionally manipulated or overstated.

In addition, all reasonable efforts should be made to ensure the accuracy of information published.

## **CONFLICTS OF INTEREST**

### **In General**

The Company expects all employees to follow the highest standards of conduct. Employees are expected to devote their best efforts to the interests of the Company. Business dealings that appear to create a conflict between the interests of the Company and an employee are unacceptable. The Company recognizes the right of employees to engage in activities outside of their employment which are of a private nature and unrelated to American Media Institute business. However, the employee must disclose any possible conflicts so that the Company can assess them and prevent potential conflicts of interest. A potential or actual conflict of interest occurs whenever an employee is in a position to influence a decision that may result in personal gain for the employee or an immediate family member (i.e., spouses or significant others, children, parents, siblings) as a result of American Media Institute's business



dealings.

Although it is not possible to specify every action that might create a conflict of interest, this policy sets forth the ones that arise most frequently. If an employee wonders whether an action, or proposed course of conduct, would create a conflict of interest, he or she should immediately contact American Media Institute Management for advice.

A violation of this policy will result in immediate and appropriate discipline, including immediate termination.

### **Outside Employment**

Employees are required to obtain written approval from American Media Institute Management before participating in outside work activities. Approval will be granted unless the activity conflicts with the Company's interest. In general, outside work activities are not allowed when they:

- Prevent the employee from fully performing his or her work for the Company, including overtime assignments
- Involve organizations doing or seeking to do business with the Company, including actual or potential vendors or customers
- Violate provisions of law or the Company's policies or rules

From time to time, Company employees may be required to work beyond their normally scheduled hours. Employees must do so when requested. In cases of conflict with any outside activity, the employee's obligations to the Company must be given priority. Employees are hired and continue in American Media Institute 's employ with the understanding that American Media Institute is their primary employer and that other employment or commercial involvement that conflicts with the business interests of American Media Institute is strictly prohibited.

## **Financial Interest in Other Business**

An employee and his or her immediate family may not own or hold any significant interest in a supplier, customer or competitor of the Company, except where such ownership or interest consists of securities in a publicly owned company and those securities are regularly traded on the open market.

## **Acceptance of Gifts**

No employee may solicit or accept gifts of significant value (i.e., in excess of \$25.00), lavish entertainment or other benefits from potential or actual customers, suppliers or competitors. Special care must be taken to avoid even the appearance of a conflict of interest. An employee may entertain potential or actual customers if such entertainment is consistent with accepted business practices, does not violate any law or generally accepted ethical standard, and the public disclosure of this entertainment will not embarrass the Company. Any questions regarding this policy should be addressed to American Media Institute Management.

## **Work Product Ownership**

All American Media Institute employees must be aware that American Media Institute retains legal ownership of the product of their work. No work product created while employed by American Media Institute can be claimed, construed, or presented as property of the individual, even after employment with American Media Institute has been terminated or the relevant project completed. This includes written and electronic documents; audio and video recordings; system code; and any concepts, ideas, or other intellectual property developed for American Media Institute, regardless of whether American Media Institute actually uses the intellectual property.

Although it is acceptable for an employee to display and/or discuss a portion or the whole of certain work product as an example in certain situations (e.g., on a résumé, in a freelancer's meeting with a prospective client), one must bear in

mind that information classified as confidential must remain so even after the end of employment, and that supplying certain other entities with certain types of information may constitute a conflict of interest. In any event, it must always be made clear that work product is the sole and exclusive property of American Media Institute. Freelancers and temporary employees must be particularly careful in the course of any work they discuss doing, or actually do, for competitors of American Media Institute.

## **Reporting Potential Conflicts**

An employee must promptly disclose to his or her supervisor, in writing, any actual or potential conflicts of interest. Approval will not be given if the relationship will interfere with the employee's duties or will damage the Company's relationships.

Employees have a duty to avoid situations in which their personal interests conflict with those of American Media Institute. While American Media Institute is keen to support employees' other interests, at no time must these interests come into conflict with those of American Media Institute. Employees must avoid involvement in outside activities that could potentially conflict with their loyalty to the Company, might adversely affect their judgment and objectivity, could interfere with time spent on American Media Institute business, or might reasonably be construed by others to do so.

While American Media Institute has confidence in the integrity of its employees, it recognizes that conflicts of interest may arise because of the diversity of American Media Institute's interests and the complexities of business practice. Therefore, employees should not place themselves in positions where personal or family interests would, or might, conflict with the interests of American Media Institute.

This following section highlights some possible conflicts, but it is by no means an exhaustive list:

**1. Political activity:** As a 501(c)(3) organization, American Media Institute is

absolutely prohibited from directly or indirectly participating in any political campaign on behalf or in opposition to any candidate for public office. In light of this restriction, American Media Institute employees are prohibited from directly or indirectly contributing to, or participating in, any political campaign. Please refrain any social media post, bumper sticker, volunteer event, or any other item, which would create the appearance of support or opposition to any candidate, party or political entity.

**2. Working outside American Media Institute:** American Media Institute employees may not engage in paid work outside American Media Institute unless prior approval has been given by an appropriate manager. Examples of such work include writing a book or article, addressing a conference, or producing commercial photography. Approval will not be withheld if the activity does not affect American Media Institute.

**3. Directorships:** An employee may not serve as a director of a commercial organization unless prior approval has been received.

**4. Personal relationships:** American Media Institute recognizes that particular difficulties may exist when an employee has family or personal relationships with people employed by a business that competes with American Media Institute. If such a relationship exists and could compromise the employee's integrity, or others' perception of it, advice should be sought from senior management.

American Media Institute recognizes that, in some cases, family members or personal friends may work closely together or within the same department. Employees should disclose to their managers any personal relationships with other employees, contractors or consultants if the relationship could lead (or be thought to lead) to a conflict of interest. Managers should then review this information to determine whether it could constitute a conflict. Any private information relating to personal relationships will be treated as strictly confidential.

**5. Purchasing decisions:** American Media Institute aims to work with organizations that share the principles and values of its code of conduct.

Employees may not purchase goods or services on American Media Institute's behalf from a family member or from a company in which they have a material financial interest without prior authorization of senior management. Approval should be given only when transactions are at arm's length and under normal commercial terms. Equally, employees must not make such purchases if doing so would benefit them, financially or otherwise. No purchasing decision should be made on the basis of customer benefit plans (e.g., Frequent Flyer Miles). American Media Institute reserves the right to require employees to decline such benefits.

It is therefore important when working with a chosen supplier or negotiating terms with a new supplier that employees take into account the following.

- When choosing a supplier, employees should comply with American Media Institute's best practice guidelines. Significant new commercial contracts or purchases should normally be subject to a bidding process involving multiple candidates.
- Orders, contracts and commitments to suppliers should be awarded strictly on the basis of merit (including cost efficiency) without favoritism.
- Where possible, the terms of all orders, contracts and commitments should be specified in writing.
- Despite the advantages to American Media Institute of maintaining relationships with suppliers, significant long-term arrangements that could interfere with fair competition should be reviewed and, if necessary, market tested at appropriate intervals.

The Policy for Engaging with Third Parties must be followed in all cases.

**6. Personal investments:** Employees must not allow investments held by them or their families to influence their work. All employees or representatives must declare in writing any financial interests they or their close relatives or associates

have in any business which may be contracted to supply goods or services to American Media Institute. Such interests or relationships could be perceived as conflicts of interest.

Employees may not:

- Hold financial interest (greater than five percent) in outside firms that conduct business or compete with American Media Institute without prior written approval from the CEO

- Carry out any transaction on behalf of American Media Institute in which they, or a family member, may personally benefit, without prior written approval from the CEO

**7. Insider dealing/insider trading:** A number of laws regulate transactions in corporate securities and the security industry. Existing legislation aims to prevent individuals from dealing in securities when in possession of unpublished price-sensitive information: i.e., information, which, if publicly available, could affect the price of those securities. Transgressions of these laws can lead to civil and criminal actions against the individual or company involved. For instance, knowledge of any of the following could constitute inside information:

- Mergers, acquisitions and disposals
- Proposed refinancing or restructuring
- Sale or purchase of significant assets
- Plans to issue or redeem securities
- Extraordinary borrowings
- Major litigation
- Major contracts
- Financial forecasts
- Changes in senior management or significant customers
- Fraud or impending insolvency

These are only examples. To avoid any possible conflicts of interest, all employees contemplating the purchase or sale of securities should familiarize themselves with laws governing this matter and with American Media Institute's Code of Conduct for Securities Dealings, proceeding only in accordance therewith. **As general guidance, employees must not trade in securities of any company on the basis of information acquired by way of their work at American Media Institute unless such information has been made public.**

All employees must perform their duties while following the American Media Institute Group Disclosure Policy. Both the Company and its individual officers and employees may be subject to penalties for noncompliance, including fines. The Chief Executive Officer of American Media Institute is designated as sole corporate spokesperson for the company. No other employee may communicate with the press, analysts or members of the investment community unless specifically authorized to do so by the designated spokesperson. Refer all enquiries to a designated spokesperson.

If in doubt as to whether an activity could be regarded as a conflict of interest, clarification must be sought from an appropriate level of management. When necessary, the manager should consult with the CEO to resolve potential conflicts.

## **COMPETITORS, CUSTOMERS AND SUPPLIERS**

When employees deal with American Media Institute's customers, the company's reputation depends on their conduct. All dealings with existing or potential competitors, customers and suppliers must be legal, fair and open.

American Media Institute believes in fair and open competition and requires strict adherence to all applicable competition laws worldwide. American Media Institute believes that its brands and products should be sold on their own merit.

Violations of competition laws may subject American Media Institute to substantial penalties and fines (including civil damages) and harm its reputation; the associated legal proceedings are extremely costly and disruptive to

operations.

All employees must, at all times, comply with competition laws as well as with any federal or state regulations.

## **MARKETING**

American Media Institute recognizes the importance of conducting promotional or marketing activity in a consistently legal, decent, honest and truthful manner. To that end, the following guidance must be adhered to in respect to all promotions:

- Marketing should be prepared with a sense of responsibility to consumers
- Marketing activity should not bring American Media Institute into disrepute
- Marketing should not contain anything likely to cause offense
- Marketing shall not mislead, or be likely to mislead, through inaccuracy, ambiguity, exaggeration, omission or otherwise
- Marketing, which are subject to legal restrictions, should not feature anything unlawful
- Marketing should comply with the American Media Institute Promotions guidelines
- Marketing should comply with the American Media Institute Information Security Policy (see above)

In addition to the above, the following is recommended:

- Guidance with respect to all marketing activity should be developed and updated periodically to ensure relevance and accuracy
- The Vice President of marketing shall be responsible for ensuring that all guidelines are adhered to

Failure to adhere to this guidance could have serious legal and reputational consequences. Advice on any marketing matter should be sought from American Media Institute's General Counsel as well as the Vice President of



marketing.

## **COMPANY EXPENDITURES AND RESOURCES**

American Media Institute expects its employees to apply the same rigor and approach to spending Company funds as they would to spending their own money. Company funds shall not be used for personal benefit. The misappropriation of company assets is strictly prohibited. Any employee who witnesses or is aware of such behavior should report it immediately to his or her manager.

All transactions involving American Media Institute's funds must be properly recorded in appropriate ledgers in such a manner that the true nature of the transaction is evident. Consequently, all transactions involving American Media Institute's funds must be:

- Fully supported by written documentation (appropriate to the level of spending and in line with agreed process) that adequately and accurately describes the business purpose of the transaction
- Independently approved by the appropriate manager delegated as the relevant signing authority
- For purposes in the interest of, and benefit to, American Media Institute

This approach also applies to Travel and Entertainment (T&E) expenses. In all cases T&E costs should be appropriately approved and strictly for business purposes, in line with T&E policy. Employees are required to be aware of the T&E policy and to adhere to it at all times. All expenditures incurred on American Media Institute business should be properly documented and authorized before reimbursement to the employee. The provisions of the American Media Institute Entertainment and Gifts Policy must be complied with in all cases.

## **FAILURE TO COMPLY**

Employees are required to agree to the terms of the Code of Conduct when beginning employment. Revisions, amendments or alterations to the Code can be implemented only after consideration and approval by the CEO of American Media Institute. Managers have an overall responsibility for ensuring that this code is disseminated to the staff.

Failure to comply with this Code may lead to disciplinary action in accordance with the disciplinary procedures, up to and including termination of employment.

## RECORDS RETENTION

American Media Institute takes seriously its obligation to preserve information relating to litigation, audits and investigations. The information listed in the retention schedule below is intended as a guideline, not an exhaustive list, for all the records American Media Institute may be required to keep in the future.

From time to time the CEO or general counsel may issue a notice, known as a “legal hold,” suspending the destruction of records due to pending, threatened, or reasonably foreseeable litigation, audits, government investigations, or similar proceedings. No records specified in any legal hold may be destroyed, even if the scheduled destruction date has passed, until the legal hold is withdrawn in writing by the CEO or general counsel.

File Category	Item	Retention Period
<b>Corporate Records</b>	Bylaws and Articles of Incorporation	Permanent
	Corporate Resolutions Permanent Board and committee meeting agendas and minutes	Permanent
	Conflict-of-Interest disclosure forms	Permanent
		3 years
<b>Finance and Administration</b>	Financial statements (audited)	6 years
	Auditor management letters	6 years
	Payroll records	6 years
	Check registers and checks	6 years

Bank deposits and statements	6 years
Chart of accounts	6 years
General ledgers and journals (includes bank reconciliations)	6 years
Investment performance reports	6 years
Equipment files and maintenance records	6 years
Contracts and agreements (includes correspondence to or from AMI officers and directors related to contracts and agreements)	6 years

**Insurance**

**Records**

Policies	Permanent
Accident reports	3 years
Safety (OSHA) reports	3 years
Claims (after settlement)	6 years
Group disability records	6 years
Deeds	Permanent
Leases (expired)	6 years
	after all obligations end

**Real Estate**

	Mortgages, security agreements	6 years after all obligations end
<b>Tax</b>	IRS exemption determination and related correspondence	Permanent
	IRS Forms 990s	6 years
	Charitable Organizations Registration Statements	6 years
<b>Human Resources</b>	Employee personnel files	Permanent
	Retirement plan benefits (plan descriptions, plan documents)	Permanent
	Employee handbooks	Permanent
	Workers comp claims (after settlement)	6 years
	Employee orientation and training materials	6 years after use ends
	Employment applications	3 years
	IRS Form I-9 (store separate from personnel file)	Greater of 1 year end of service, or three years
	Withholding tax statements	6 years

<b>Technology</b>	Software licenses and support	6 years
	agreements	after all obligations end

## **ELECTRONIC DOCUMENTS AND RECORDS**

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files corresponding to a document type on the above schedule will be maintained for the appropriate amount of time. If a user has sufficient reason to keep an email message, the message should be printed in hard copy and kept in the appropriate file or moved to an “archive” computer file folder.

Emails not kept will be subject to auto- delete 60 days after creation (see American Media Institute Email Policy).

## **EMERGENCY PLANNING**

American Media Institute’s records will be stored in a safe, secure and accessible manner. Documents and financial files essential to American Media Institute operations in an emergency will be duplicated or backed up at least every day and maintained off-site.

## **DOCUMENT DESTRUCTION**

American Media Institute’s general counsel is responsible for the ongoing process of identifying records which have met the required retention period and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding.

Document destruction will be suspended immediately upon any indication of an

official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

All records and documents not listed in the retention schedule above must be destroyed within 90 days after they are no longer needed for business or operational purposes. Questions regarding the retention of documents not listed in this chart should be directed to American Media Institute's general counsel.

## **COMPLIANCE**

Failure on the part of employees to follow this policy could result in civil and criminal sanctions against AMI and its employees. Therefore, the responsible individual(s) may be subject to disciplinary action. The CEO and Board Chairman will periodically review these procedures with legal counsel or with American Media Institute's CFO to ensure that they are in compliance with new or revised regulations.

## **WHISTLEBLOWER POLICY**

### **PURPOSE**

American Media Institute requires board members, executives and employees to observe the highest ethical standards in the conduct of their duties and responsibilities. All directors, executives and employees must comply with all applicable laws and regulatory requirements.

### **REPORTING RESPONSIBILITY**

American Media Institute supports an “Open Door Policy” and encourages board members and employees to share their questions, concerns, suggestions or complaints regarding American Media Institute and its operations with *someone who can address them properly*. In most cases, board members or executives should present their concerns to the Chairman of the Board, and employees should address their concerns to The general counsel. However, if a board member is uncomfortable speaking with the Board Chair, or is not satisfied with the Board Chairman’s response, or if an employee is uncomfortable speaking with the general counsel or is not satisfied with the general counsel response, the board member, executive or employee is encouraged to speak with anyone on the Board or with American Media Institute’s outside legal counsel. Contact information can be obtained from the general counsel.

### **RETALIATION PROHIBITED**

No board member, executive, or employee who in good faith reports a violation of a law or regulation shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable persons to raise serious concerns within American Media Institute.



## **COMPLIANCE OFFICER**

American Media Institute's general counsel, along with the Chairman of the Board, will act as AMI's Compliance Officer responsible for investigating and resolving all employee complaints and allegations concerning violations of the Principles and/or Code. The Board Chair or his or her designee will serve as Compliance Officer if the complaint involves the general counsel. If the complaint involves both the general counsel and the Board Chairman, outside legal counsel will carry out the functions of the Compliance Officer.

## **GOOD FAITH REQUIREMENT**

Anyone filing a complaint concerning a violation or suspected violation of the law or regulation must be acting in good faith and have reasonable grounds for believing that the information disclosed indicates a violation. Any allegations that prove unsubstantiated, based on malicious intent or on false information, will be viewed as serious disciplinary offense.

## **CONFIDENTIALITY**

Violations or suspected violations may be submitted on a confidential or anonymous basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the conduct of an adequate investigation.

## **HANDLING OF REPORTED VIOLATIONS**

The Compliance Officer or the person serving in that role will acknowledge receipt of the violation or suspected violation report by writing a letter (or email) to the complainant within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

## EXPENSES AND TRAVEL

### SCOPE

The American Media Institute Employee Expenses and Travel Policy covers expenses incurred during the course of American Media Institute operations. Employees will be reimbursed only for reasonable expenses. Reimbursement requires the submission of properly documented and authorized expense claims supported by receipts where appropriate.

Employees should not incur unnecessary expenses and should spend the company's money as carefully as they would spend their own.

Although this policy covers most expenses incurred through company activities, employees may incur expenses for which an explicit policy does not exist. In these circumstances, judgment should be used to determine if the amount is reimbursable. In all cases, reimbursement for expenses not explicitly covered by company policies must be approved in advance by a manager.

### EXPENSE CLAIM PROCESS

It is important that expense claims be submitted on a timely basis to ensure that AMI records are up-to-date so that expenses can be appropriately authorized and the reimbursement process can be expedited.

**All expenses must be submitted within 30 days of an employee's personal or company credit card statement date or within a month of incurring the expense in the case of cash disbursal.** Expense claims not completed within this time frame, or submitted without adequate receipts, may not be reimbursed.

### ROUTINE EXPENSES OVERVIEW

Routine expenses incurred while working away from home and/or the normal place of work in the course of AMI business include:

## **Travel**

- Train travel
- Taxis
- Car rental
- Air travel

## **Overnight Accommodation**

- Hotel
- Meals
- Incidentals

## **Communication costs**

- Telephone calls regarding business
- Mobile telephones
- Internet/Wi-Fi costs

## **FRAUDULENT REPORTING**

The submission of a business expense claim containing fraudulent information constitutes gross misconduct, which, if proven, may be cause for dismissal.

## **AUTHORIZATION**

All claims must be approved by a manager. Failure to obtain the necessary authorization may disallow reimbursement.

## **RECEIPTS**

Original receipts must be provided where required by this policy. The company will not reimburse expenses without a receipt or with only a photocopy of the receipt. Original receipts are defined as follows:

- Rail travel – original receipt or train ticket
- Taxis – original receipt or bill completed by the taxi driver
- Hotel – original hotel bill
- Other expenses – original bill
- Airline tickets – original passenger receipt or passenger coupon

## **TRAVEL**

Please consider whether travel is actually necessary. Could a telephone conversation, conference call or videoconference accomplish the same result? If personal attendance is essential, this section provides a uniform policy for travel and the reimbursement of related expenses. It addresses most standard situations but cannot anticipate all of them.

Travel should be booked through American Media Institute's preferred travel agents (McNair). These agents have been provided a usage policy, and exceptions to this policy can be authorized only by one of the leadership team. More importantly, our travel agents are empowered to secure bulk discounts not available to the general public.

### **Cancellation and Amendment Fees**

If travel arrangements need to be canceled or changed for business reasons and this cancellation or change incurs charges, the charges will be reimbursed. If the changes are made for personal reasons, they may not be submitted for reimbursement.

## **Rail Travel**

All employees must travel coach or economy class except with prior approval from the relevant manager. Wherever possible, advance- purchase tickets and specified travel time fares should be purchased to reduce costs. Online purchasing is usually the most effective way to obtain these discounts.

## **Car Rental**

Car rentals should be arranged solely through American Media Institute's preferred travel agents (McNair).

## **Business mileage**

Mileage reimbursement is available only to writers on assignment who are using a personal vehicle in lieu of renting a car. When traveling on company business in a personal vehicle, all business mileage must be recorded. Locations, times, dates, reason for trip, mileage, etc., must be claimed at the correct car mileage rate in force at the time, as determined by the Internal Revenue Service. **In 2015, that rate is 57.5 cents per mile.**

## **Taxis/ Uber**

The cost of taxis may be claimed only for short journeys when no other means of transport (i.e., buses/ subways/trains) is reasonably practical. Employees attending company social functions or departmental social events are not entitled to claim either overnight accommodation or travel reimbursements, including taxi fares, unless specifically authorized.

Please note that the above guidelines, which apply to all American Media Institute staff, are not exhaustive and that the policy remains flexible and adaptable to specific circumstances. If in doubt, please seek prior authorization from the CFO.

## **Air Travel**

Air travel requires advance approval by a member of the leadership team. When air travel is appropriate and agreed to, employees must schedule the most cost-effective flights. Travel reservations should therefore be made as far in advance as practicable. **Business-class air travel will be considered only for flights longer than five hours.** Employees may, of course, upgrade with their own air miles or pay for upgrades themselves.

## **Alternative Travel and Accommodation Itineraries**

Most business trips will involve travel for only those days required for conducting business.

## **Per Diems**

American Media Institute does not pay per diems.

## **Passports**

The cost of passports is considered a personal expense and is not reimbursable by American Media Institute.

## **Visa Applications**

The cost of visa applications required for work purposes will be reimbursed. This must be preapproved by a member of the leadership team.

## **ACCOMMODATIONS**

No hotel accommodations should be booked without the prior approval of

managers. For any hotel stays longer than five nights, additional approval is required from a member of the leadership team. Employees must select reasonable hotels and rooms. While personal safety and location are important factors, use discretion when selecting the class of hotel. Except in exceptional circumstances, such as when no other accommodations are available and the trip is absolutely necessary, hotel rates in the United States should not exceed \$250 per night (excluding taxes). Hotels outside the United States should be reasonably priced.

If a conference in a remote location is held entirely at one hotel and most conference-goers are expected to be at that hotel, it will be deemed acceptable to stay at the hotel even if its per-night room price exceeds \$250 plus taxes.

## TIME OFF

### PAID LEAVE

Time away from work is vital to morale and productivity; therefore, all full-time employees are eligible for paid leave. Full-time AMI employees will receive twenty (20) days of paid leave, inclusive of vacation and sick days, in each calendar year between the first and last days of that year. Full-time employees who begin or end their employment in the course of a given year will receive paid leave days proportionate to the period of the calendar year in which they are employed by American Media Institute. For example, a full-time employee who begins employment on July 1st of a given year and continues until the end of that year will receive ten (10) days of paid leave rather than twenty (20).

All paid leave days expire on the last day of each calendar year and do not accrue or carry over to subsequent years. All unused paid leave days are forfeited on that day and no compensation, cash or otherwise, are due to the employee. Furthermore, upon termination or separation, all unused paid leave days are forfeited and no compensation, cash or otherwise, is due to the employee unless otherwise determined by applicable law. Therefore, full-time employees are encouraged to use all their paid leave days during the calendar year.

Employees are expected to coordinate their paid leave with management so it does not conflict with work commitments. **Dir. of HR maintains a master annual calendar of paid leave requests. Employees are expected to notify Dir. of HR and get the written approval of his/her senior manager.** Any paid leave days that encompass four (4) consecutive business days must be requested in writing and submitted to American Media Institute management no fewer than thirty (30) days in advance and are subject to approval, with the exception of family and medical emergencies for which management will make every reasonable accommodation.

In addition to the paid leave days detailed above, the American Media Institute offices will be closed on the following days, considered paid holidays, and the



salaries of full-time employees will not be offset or diminished by failure to work on these days: New Year's Day; Good Friday; Memorial Day; Independence Day; Labor Day; Thanksgiving Day; the Friday immediately following Thanksgiving Day; Christmas Day; and December 23rd through January 3rd inclusive.

## **JURY DUTY**

A leave of absence for jury duty will be granted to any full-time or part-time employee. During this leave, employees will be compensated by payment of an amount equal to the difference between their jury duty pay and their regular salary. An employee on jury duty is expected to report to work any day he/she is excused from jury duty.

Upon receipt of the jury-duty notice, the employee should immediately notify his/her supervisor, as well as the CFO, and a copy of the notice should be attached to the employee's file.

Upon the employee's return, he or she must notify AMI Management and submit a signed Certificate of Jury Service indicating the number of days served. If the jury duty falls at a time when the employee cannot be away from work, the company may ask him or her to ask for a more convenient time to serve, in accordance with the court's procedures. The employee must cooperate with this request.

## **MILITARY LEAVE**

An employee who is a member of the United States Army, Navy, Air Force, Marines, Coast Guard, National Guard, Reserves or Public Health Service will be granted an unpaid leave of absence for military service, training or related obligations in accordance with applicable law.

Employees on military leave may substitute their accrued paid leave time for unpaid leave.

At the conclusion of the leave, upon the satisfaction of certain conditions, employees generally have the right to return to the same positions they held before the leave or to positions, for which they are qualified, that offer like seniority, status and pay.

## Requests for Leave

**1. Leave for active or reserve duty:** Upon receipt of orders for active or reserve duty, an employee should promptly notify his/her supervisor and AMI Management and submit a copy of the military orders to his/her supervisor and AMI Management (unless he/she is unable to do so because of military necessity or because it is otherwise impossible or unreasonable).

**2. Leave for training and other related obligations (e.g., fitness for service examinations):** Employees will also be granted time off for military training (normally 14 days plus travel time) and other related obligations, such as examinations to determine fitness to serve. Employees should advise their supervisors and/or department heads of their training schedules and/or other related obligations as far in advance as possible.

## Notice of Return from Military Leave

An employee returning from military service must provide notice of, or submit an application for, re-employment.

An employee who served for less than 31 days or reported for a fitness examination must provide notice of re-employment at the beginning of the first full regularly scheduled work period that begins at least eight hours after the employee has returned from the location of service.

An employee who served for more than 30 but less than 181 days must submit an application for re-employment no later than 14 days after completing the period of service. If this deadline is impossible or unreasonable through no fault of the employee, he or she may submit it on the next calendar day when submission becomes possible. The employee must also provide documentation within two weeks of his/her return (unless such documentation does not yet exist or is not readily available) showing the following: (i) the application for re-employment is timely (i.e., submitted within the required time period); (ii) the period of service has not exceeded five years; and (iii) the employee received an honorable or general discharge.

An employee who served for more than 180 days must submit an application for

re-employment no later than 90 days after the completion of the service.

An employee who has been hospitalized or is recovering from an injury or illness incurred or aggravated while serving must report to American Media Institute Management (if the service was less than 31 days) or submit an application for re-employment (if the service was greater than 30 days) at the end of the necessary recovery period (which may not exceed two years).

## **TIME OFF TO VOTE**

On days when elections for public office ("elections for public office" includes elections for sheriff, school board, district attorney, and all primary and general elections) are scheduled throughout the state, county, city or town in which the employee works, schedules will be changed as needed to ensure that work either starts at least three hours after the polls open.

Employees living in other cities or states will need to inform their supervisors in advance if they expect any conflicts between their work schedules and the exercise of voting rights in any election for any public office. Supervisors will find out when the polls are open and adjust employees' schedules as needed to ensure that they have the opportunity to vote. No employee will be penalized or retaliated against for requesting time off to vote.

## **FAMILY AND MEDICAL LEAVE ACT (FMLA)**

The Family and Medical Leave Act (FMLA) provides eligible employees with up to 12 workweeks of unpaid leave during a 12-month period for certain family and medical reasons. During this leave, eligible employees are entitled to continued group health plan coverage as if they had continued to work. At the conclusion of the leave, subject to some exceptions, an employee generally has the right to return to the same or an equivalent position.

### **Employee Eligibility Criteria**

To be eligible for FMLA leave, an employee must have been employed by AMI for at least 12 months (which need not be consecutive); and for at least 1,250 hours during the 12-month period immediately preceding commencement of

the leave.

## **Events, Which May Entitle an Employee to FMLA Leave**

FMLA leave may be taken for any one, or for a combination of, the following reasons:

- The birth of the employee's child or to care for the newborn child
- The placement of a child with the employee for adoption or foster care or to care for the newly placed child
- To care for the employee's spouse, child or parent (but not in-law) with a serious health condition
- The employee's own serious health condition that makes him/her unable to perform one or more of the essential functions of his or her job. A "serious health condition" is an injury, illness, impairment, or physical or mental condition that involves inpatient care or continuing treatment by a health care provider.

An eligible employee is entitled to up to 12 workweeks of unpaid leave during a 12-month period for any FMLA qualifying reason(s). The 12-month period is the calendar year.

## **Limitations on FMLA Leave**

Leave to care for a newborn or for a newly placed child must conclude within 12 months after the birth or placement of the child.

When both spouses are employed by American Media Institute, they are together entitled to a combined total of 12 workweeks of FMLA leave within the designated 12 month period for the birth, adoption or foster care placement of a child, for aftercare of the newborn or newly placed child, and to care for a parent (but not in-law) with a serious health condition. Each spouse may be entitled to additional FMLA leave for other FMLA qualifying reasons (i.e., the difference between the leave taken individually for any of the above reasons and 12 workweeks, but not more than a total of 12 workweeks per person).

For example, if each spouse took 6 weeks of leave to care for a newborn child, each could later use an additional 6 weeks due to his/her own serious health condition or to care for a child with a serious health condition.

#### **D.C. FAMILY LEAVE ACT**

Pursuant to the D.C. Medical Leave Act, employees who have 1,000 hours of service with an employer during the 12-month period before leave are eligible, over a 2 year period, for up to 16 weeks of family medical leave plus 16 weeks of medical leave for the employee's own serious health condition.

## EMPLOYEE BENEFITS

### DISCLAIMER

The Company offers a variety of employee benefit programs designed to assist you and your eligible dependents in meeting the financial burdens that can result from illness and disability, and to help you plan for retirement. This portion of the Employee Handbook contains a very general description of the benefits to which you may be entitled. Please understand that this general explanation is not intended to, and does not, provide all the details of these benefits. Therefore, this Handbook does not change or otherwise interpret the terms of the official plan documents. Your rights can be determined only by referring to the full text of those documents, which are available for your examination from American Media Institute Management. To the extent that any information contained in this Handbook is inconsistent with the official plan documents, the provisions of the official documents always govern.

Please note that nothing contained in the benefit plans described herein creates a promise of employment or future benefits, or a binding contract between the Company and its employees, retirees or their dependents, for benefits or for any other purpose. All employees remain subject to discharge or discipline to the same extent as if these plans were not in effect.

As in the past, American Media Institute reserves the right, in its sole and absolute discretion, to amend, modify or terminate, in whole or in part, any or all of the provisions of the benefit plans described herein, including any health benefits extended to retirees and their dependents. Further, the Company reserves the exclusive right, power and authority, in its sole and absolute discretion, to administer, apply and interpret the benefit plans described herein, and to decide all matters arising in connection with their operation or administration.

For more complete information regarding any of our benefit programs, please refer to the Summary Plan Descriptions, which were provided to you separately, or contact American Media Institute Management. If you have lost or

misplaced those descriptions, please contact American Media Institute Management for another copy.

## **HEALTH INSURANCE**

American Media Institute currently offers regular full-time employees who have been

employed by American Media Institute for 30 days health coverage under a preferred provider organization (PPO) plan.

The PPO plan provides comprehensive hospital and major medical insurance coverage. Under the PPO plan, participants can choose to go in-network or out-of-network at any time. Many in-network services are fully covered (though some require a co-payment) and no claim forms need to be completed. Out-of-network services are generally subject to an annual deductible and coinsurance payments, and require the submission of claim forms to the insurance carrier for reimbursement.

You have up to 30 days from your employment date to make your medical plan election. Once made, your election is generally fixed for the remainder of the plan year. However, if you undergo a change in family status (as defined in the Plan document), you may make a midyear change (i.e., you may change coverage from individual to family or from family to individual and may add or delete dependents, or revoke coverage), provided you do so within 30 days from the date of the change in family status. This provision does not entitle you to make a midyear change from one medical carrier to another. Please contact the Human Resources Department to determine if a family status change qualifies under the Plan document and IRS regulations.

At the end of each calendar year, during open enrollment, you are free to change your medical elections (including medical carriers) for the following calendar year, whether or not you have a change in family status.

The CFO will assist you in making the necessary arrangements for enrollment. A

complete description of the plans is provided to each employee as Summary Plan Descriptions and appropriate supplements.

If you decline health insurance, you must complete and submit to the CFO a signed Decline of Benefits form.

## **WORKERS' COMPENSATION BENEFITS**

The Company is covered under statutory Workers' Compensation Laws. Should you sustain a work-related injury, you must immediately notify your department supervisor and general counsel. Should your injury require the attention of a doctor, you can obtain a list of approved physicians by calling our Workers' Compensation Carrier's Physician Network Referral Unit. The general counsel will give you the Referral Unit's telephone number or telephone for you. In the case of an emergency, you should go to the nearest hospital emergency room for treatment and then use the Network Referral Unit if additional treatment is necessary.

## **401(k) PLAN**

Employees are encouraged to join the 401 (k) retirement plan, which offers a 6% employer match for employee contributions. This is the most generous "safe harbor" match allowed by law.

The Company offers a voluntary pretax salary reduction plan in which regular full-time employees 21 years of age or older may elect to participate beginning with the first payroll period following thirty (30) days of employment. During "window" periods in each calendar year, you may change the dollar amounts or the percentages of your contributions. Notices of these "window" periods and other Plan information will be circulated to all employees periodically throughout the year.

Further details about the Plan may be obtained from the Accounting Department and the Plan document.

If you elect to decline participation in the 401 (k) Plan, you must complete and submit to the CFO a signed Decline of Benefits form.



## **ON THE JOB**

### **ATTENDANCE, PUNCTUALITY AND DEPENDABILITY**

Because AMI depends heavily upon its employees, it is important that employees attend work as scheduled. Dependability, attendance, punctuality, and a commitment to do the job right are essential. Therefore, employees are expected at work on all scheduled workdays and work hours. Moreover, an employee must notify his/her supervisor or CFO (who maintains employee attendance calendar) as far in advance as possible, but not later than one hour before his/her scheduled starting time, if he/she expects to be late or absent. This policy applies for each day of absence. An employee who fails to contact his/her immediate supervisor or CFO may be considered as having voluntarily resigned. A careful record of absenteeism and lateness is kept by the employee's supervisor and becomes part of the personnel record. To the extent permitted by law, absenteeism and lateness lessen an employee's chances for advancement and may result in dismissal.

### **DRUG ABUSE**

Manufacture, distribution, dispensation, possession, or use of any illegal drug, or controlled substance on Company premises is strictly prohibited. These activities constitute serious violations of Company rules, jeopardize the Company and can create unsafe situations that substantially interfere with job performance. Employees in violation of the policy are subject to appropriate disciplinary action, up to and including dismissal. Additionally, AMI reserves the right to require an employee to undergo a medical evaluation under appropriate circumstances.

### **CELL PHONE USAGE POLICY**

This document sets forth American Media Institute (the "Company") policies about company cell phone usage and applies to all Company employees. The Company reserves the right to modify or update these policies at any time.

## Use of Company Cell Phones:

- a. General Use at Work.** While at work employees are expected to exercise the same direction in using personal cell phones as they use with company phones. Excessive personal calls during the work day, regardless of the phone used, can interfere with employee productivity and be distracting to others. Employees should restrict personal calls during work time and should use personal cell phones only scheduled breaks or lunch periods in working areas. Other personal calls should be made during non-work time whenever possible, and employees should ensure that their friends and family members are instructed of this policy. The company is not liable for the loss of personal cell phones brought into the work place.

to ensure the effectiveness of meetings, employees are asked to leave cell phones at their desk. On the unusual occasion of an emergency or anticipated emergency that requires immediate attention, the cell phone may be carried to the meeting on vibrate mode.

- b. Unsafe Work Situations.** In unsafe work situations such as construction sites, near heavy machinery, etc. Company cell phones shall not be used.
- c. Use While Driving.** Company cell phones shall not be used while driving.
- d. Personal Use of Company Cell Phones.** Company cell phones that are provided to employees are for business use only. Company cell phones are to be protected by the employee and returned when his or her employment ends.
- e. Review of Monthly Charges.** All company cell phones will undergo a review of monthly charges for excessive or irregular use.

## **FIREARMS POLICY**

Employees who hold a license to carry a handgun and who lawfully possess a firearm or ammunition may store such firearm or ammunition in the Company Gun Safe on Company premises, as long as the following requirements are met:

1. The employee must complete and have on file with Human Resources a current Firearms Approval Form. It is the employee's responsibility to request the form and to ensure that it does not expire.
2. The employee must attest on Firearms Approval Form that he or she holds a License to Carry, and otherwise lawfully possesses a firearm or ammunition to be stored on Company property at the time the Firearm Approval Form is submitted. Any false statements made by the employee on the Firearm Approval Form will subject the offending employee to discipline up to and including discharge.
3. At all times the firearm or ammunition must be hidden from plain view. In addition, the Company Gun Safe in which the firearm or ammunition is stored must be locked.

Failure to abide by any of the following requirements for storing a firearm or ammunition in the Company Gun safe will result in disciplinary action up to and including discharge.

This policy applies to lawfully possessed firearms and ammunition only. All other weapons are prohibited (including those typically used for hunting) on Company premises regardless of whether a Firearms Approval Form has been filed.

## **APPEARANCE AND CONDUCT**

AMI strives to maintain a well-functioning workplace environment free from unnecessary distractions. As part of that effort, the Company requires employees to maintain a neat and clean appearance appropriate for the workplace setting and the work being performed. All dress code decisions are at the discretion of the employee's direct supervisor.

### **Conduct**

Employees who fail to maintain proper standards of conduct toward their work, their co-workers or the Company's customers, or who violate any of the Company's policies, are subject to appropriate disciplinary action, up to and including discharge. All instances of misconduct should be referred immediately to the general counsel.

## **ANTI-NEPOTISM POLICY**

Members of an employee's immediate family will be considered for employment on the basis of their qualifications. Immediate family may not be hired, however, if employment would:

- Create a supervisor/subordinate relationship with a family member
- Potentially create an adverse impact on work performance
- Create either an actual conflict of interest or the appearance of such a conflict

This policy must also be considered when assigning, transferring, or promoting employees. For the purpose of this policy, immediate family includes: spouse, parent, child, sibling, in-law, aunt, uncle, niece, nephew, grandparent, grandchild, and members of household. This policy also applies to romantic relationships.

Employees who become immediate family members or establish a romantic relationship may continue employment as long as it does not involve any of the concerns listed above. If one of the conditions outlined arises, attempts will be made to find a suitable position within American Media Institute to which one of the employees may transfer. If employees become immediate family members or establish a romantic relationship, the Company will make reasonable efforts to assign job duties so as to minimize problems of supervision, safety, security or morale. **If accommodations of this nature are not feasible, the employees will determine which of them will resign.** If the employees cannot make that decision, the Company will decide the issue in its sole discretion.

## **ROMANTIC OR SEXUAL RELATIONSHIPS**

Consenting romantic or sexual relationships between a supervisor/manager and an employee may at some point create unhappy complications and significant difficulties for all concerned: the employee, the supervisor/manager and the Company. Any such relationship may, therefore, be contrary to the best interests of the Company.

Accordingly, the Company strongly discourages such relationships and any conduct (such as dating between a supervisor/manager and an employee) that is designed or may reasonably be expected to lead to a romantic or sexual relationship.

By its discouragement of romantic and sexual relationships, the Company does not intend to inhibit the social interaction (such as lunches, dinners or attendance at entertainment events) that are an important part or extension of the working environment. The policy articulated above is not to be used to justify or excuse a supervisor's/manager's refusal to engage in such social interaction with employees.

If a romantic or sexual relationship between a supervisor/manager and an employee should develop, it is the responsibility and obligation of the supervisor/manager promptly to disclose the existence of the relationship to

general counsel. The employee may make the disclosure as well, but the burden of doing so is on the supervisor/manager.

The company recognizes the ambiguity and the variety of meanings that can be given to the term romantic. It is assumed, however, that either or both of the parties to such a relationship will appreciate the meaning of the term as it applies to either or both of them and will act in a manner consistent with this policy.

Upon being informed or learning of the existence of such a relationship, general counsel may take whatever steps it deems appropriate. At a minimum, the employee and supervisor/manager will not thereafter work together on the same matters (including matters pending at the time of disclosure). In addition the supervisor/manager must withdraw from participation in activities or decisions that may reward or disadvantage the employee, including, but not limited to: hiring, evaluations, promotions, compensation, work assignments and discipline.

In addition, and in order for the Company to deal effectively with the potentially adverse consequences of such a relationship for the working environment, any person who believes that he or she has been adversely affected by such a relationship, notwithstanding its disclosure, is encouraged to make his or her views known to the general counsel. This policy applies without regard to the sex and/or sexual orientation of the participants in the relationship.

**VIOLENCE IN THE WORKPLACE**

The Company strongly believes that all employees should be treated with dignity and respect. Acts of violence will not be tolerated. Any instances of violence must be reported to the employee's supervisor or general counsel. All complaints will be fully investigated.

The Company will promptly respond to any incident or suggestion of violence. Violation of this policy will result in disciplinary action, up to and including immediate discharge.

## **ACCIDENTS AND EMERGENCIES**

Maintaining a safe work environment requires the continuous cooperation of all employees. The Company strongly encourages employees to communicate with colleagues and supervisors regarding safety issues.

All employees will be provided care, first aid and emergency service as required for injuries or illnesses while on American Media Institute premises. Employees should contact their supervisor, the nearest supervisor, and/or 911 in the event of an accident or emergency.

If an employee is injured on the job, American Media Institute provides coverage and protection in accordance with the Workers' Compensation Law. When an injury is sustained while at work, it must be reported immediately to the employee's supervisor, who in turn will notify general counsel.

Failure to report accidents is a serious matter as it may preclude an employee's coverage under Workers' Compensation Insurance.

## **OPEN DOOR POLICY**

American Media Institute promotes an atmosphere in which employees can talk freely with members of the management team. Employees are encouraged to openly discuss with their supervisor any problems, so appropriate action may be taken. American Media Institute is interested in all of our employees' success and happiness. We, therefore, welcome the opportunity to help employees whenever feasible.

## **INTERNAL COMPLAINT PROCEDURES**

To foster sound employee-employer relations through communication and reconciliation of work-related problems, American Media Institute provides employees with an established procedure for expressing employment related

concerns.

In situations where employees feel a complaint is in order, he or she should direct the legitimate work-related complaint to his/her immediate supervisor to seek a resolution of the issue(s) through discussion. The Company will attempt to resolve the complaint within a reasonable period of time while preserving, to the extent feasible, the confidentiality and privacy of those involved.

## **SOLICITATIONS, DISTRIBUTIONS, AND BULLETIN BOARD USE**

Employees may not solicit one another during working time, nor may they distribute literature in work areas at any time. Persons not employed by American Media Institute may not solicit American Media Institute employees for any purposes on Company premises.

### **Bulletin Boards**

Bulletin boards maintained by American Media Institute are to be used only for posting or distributing material of the following nature:

- Notices of matters directly concerning Company business;
- Business-related announcements which are applicable and of interest to employees

All posted material must be authorized by general counsel. All employees are expected to check these bulletin boards periodically for new and/or updated information and to follow the rules set forth in all posted notices. Employees are not to remove material from the bulletin boards.

## **EMAIL AND INTERNET POLICY**

Every American Media Institute employee is responsible for using the electronic mail (Email) system properly and in accordance with this policy. Any questions about this policy should be addressed to American Media Institute



Management.

Use of American Media Institute Email (as opposed to private email) is Mandatory. When using email for American Media Institute business purposes, all employees must use their assigned American Media Institute email address. The American Media Institute email system auto-deletes email sixty (60) days after its creation. Accordingly, all documents required to be retained under American Media Institute's Record Retention Policy must be printed and preserved before auto-deletion.

Please be advised that an employee's use of a non- American Media Institute email address for American Media Institute business purposes constitutes grounds for termination. Any questions concerning the use or preservation of email should be directed to American Media Institute's general counsel.

The email system is the property of American Media Institute and has been provided by for use in conducting company business. All communications and information transmitted by, received from, or stored in this system are company records and property of American Media Institute. The email system is to be used for company purposes only. Use of the email system for personal purposes is prohibited.

Employees have no right of personal privacy in any matter stored in, created, received, or sent over the American Media Institute mail system.

American Media Institute, in its discretion as owner of the email system, reserves and may exercise the right to monitor, access, retrieve, and delete any matter stored in, created, received, or sent over the email system, for any reason and without the permission of any employee.

Even if employees use a password to access the email system, the confidentiality of any messages stored in, created, received, or sent from the American Media Institute email system cannot be assured. Use of passwords or other security measures does not in any way diminish American Media Institute's right to access materials on its system nor create any privacy rights for

employees in the messages and files on the system. Any password used by employees must be revealed to American Media Institute as email files may need to be accessed by the company in an employee's absence.

Employees should be aware that deletion of any email messages or files will not eliminate them from the system. All emails are stored on a central backup system in the normal course of data management.

Even though American Media Institute American Media Institute has the right to retrieve and read any email messages, those messages must still be treated as confidential by other employees and accessed only by the intended recipient. Employees are not authorized to retrieve or read any email messages not sent to them. Any exception to this policy must receive the prior approval of general counsel.

American Media Institute 's policies against sexual or other harassment apply equally to the email system, and any violation of those policies is grounds for discipline up to and including discharge. Therefore, no email messages should be created, sent, or received if they contain intimidating, hostile, or offensive material concerning race, color, religion, sex, age, national origin, disability or any other classification protected by law.

The email system may not be used to solicit for religious or political causes, commercial enterprises, outside organizations, or other non-job-related solicitations.

The email system shall not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary financial information, or similar materials without prior authorization from American Media Institute Management. Employees, if uncertain whether certain information is copyrighted, proprietary, or otherwise inappropriate for transfer, should resolve all doubts in favor of not transferring the information and should consult general counsel.

Although American Media Institute recognizes that the Internet may have useful applications to American Media Institute 's business, employees may not

engage in Internet use unless a specific business purpose requires such use. Online dating and auction sites will not be approved. Absent such approval, employees may not at any time or for any reason access the Internet using American Media Institute 's computer systems. "Surfing the Net" is not a legitimate business activity.

Employees are reminded to be courteous to other users of the system and always to conduct themselves in a professional manner. Emails are sometimes misdirected or forwarded and may be viewed by persons other than the intended recipient. Users should write email communications with no less care, judgment and responsibility than they would use for letters or internal memorandums written on American Media Institute letterhead.

Because email records and computer files may be subject to discovery in litigation, American Media Institute employees are expected to avoid making statements in email or computer files that would not reflect favorably on the employee or American Media Institute if disclosed in court or elsewhere.

Employees may not access another employee's email account without the latter's permission.

Any employee who discovers misuse of the email system should immediately contact the CIO.

Violations of American Media Institute 's email policy may result in disciplinary action up to and including discharge.

American Media Institute reserves the right to modify this policy at any time, with or without notice.

Employees are required to sign an Email and Internet Policy Acknowledgment Form as a condition of employment. The form is to be signed on acceptance of an employment offer by American Media Institute.

## EMAIL AND INTERNET POLICY ACKNOWLEDGMENT FORM

I acknowledge that I have received a copy of American Media Institute 's Email and Internet Policy. I agree to read it thoroughly, and agree that if there is any policy or provision I do not understand, I will seek clarification from American Media Institute Management.

I understand that my use of American Media Institute 's email system constitutes my consent to all the terms and conditions of that policy.

In particular, I understand that (1) the email system and all information transmitted by, received from, or stored in that system are the property of American Media Institute; (2) the system is to be used only for business purposes and not for personal purposes; and (3) I have no expectation of privacy in connection with the use of the email system or the Internet or with the transmission, receipt, or storage of information in that system.

I agree not to use a code, access a file, or retrieve stored communications unless authorized. I acknowledge and consent to American Media Institute 's monitoring my use of the email system and the Internet at any time at its discretion, including printing and reading all emails entering, leaving, or stored in the system.

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

## **EMPLOYER INFORMATION AND PROPERTY**

The protection of American Media Institute sources, business information, property and all other Company assets are vital to the interests and success of American Media Institute. No American Media Institute -related information or property, including without limitation, identity of sources, documents, files, records, computer files, equipment, office supplies or similar materials (except in the ordinary course of performing duties on behalf of American Media Institute) may, therefore, be removed from the Company's premises. In addition, when an employee leaves American Media Institute, the employee must return to the Company all American Media Institute -related information and property that the employee has in his/her possession, including without limitation, documents, files, records, manuals, information stored on a personal computer or on a computer disk, supplies, and equipment or office supplies. Violation of this policy is a serious offense and will result in appropriate disciplinary action, including discharge or litigation.

## **VOICE-MAIL POLICY**

Every American Media Institute employee is responsible for using the Voice Mail system properly and in accordance with this policy. Any questions about this policy should be addressed to general counsel.

The Voice-Mail system is the property of American Media Institute. All communications and information transmitted by, received from, or stored in this system are company records and property of American Media Institute. The Voice Mail system is to be used for company purposes only.

Employees have no right of personal privacy in any matter stored in, created, received, or sent over the American Media Institute Voice Mail system.

American Media Institute, in its discretion as owner of the Voice Mail system, reserves and may exercise the right to monitor, access, retrieve, and delete any matter stored in, created, received, or sent over the Voice Mail system, for any reason without the permission of any employee and without notice.

Even if employees use a password to access the Voice Mail system, the confidentiality of any message stored in, created, received, or sent from the American Media Institute Voice Mail system cannot be assured. Use of passwords or other security measures does not in any way diminish American Media Institute 's right to access materials on its system or create any privacy rights of employees in the messages and files on the system.

Employees should be aware that deletion of any Voice Mail messages or files does not truly eliminate the messages from the system. All Voice-mail messages may be stored on a central backup system in the normal course of data management.

Even though American Media Institute reserves the right to retrieve and read any Voice-mail messages, those messages should still be treated as confidential by other employees and accessed only by the intended recipient. Employees are not authorized to retrieve or listen to any Voice-mail messages not sent to them. Any exception to this policy must receive the prior approval of general counsel.

American Media Institute 's policies against sexual or other harassment apply fully to the Voice Mail system, and any violation of those policies is grounds for discipline up to and including discharge. Therefore, no Voice-mail messages should be created, sent, or received if they contain intimidating, hostile, or offensive material concerning race, color, religion, sex, age, national origin, disability or any other classification protected by law.

The Voice Mail system may not be used to solicit for religious or political causes, commercial enterprises, outside organizations, or other non-job-related solicitations.

Users should create Voice Mail communications with no less care, judgment and responsibility than they would use for letters or internal memorandums written on American Media Institute letterhead.

Employees should also use professional and courteous greetings on their Voice Mail boxes so as to properly represent American Media Institute to outside callers.

Because Voice Mail records and messages may be subject to discovery in litigation, American Media Institute employees are expected to avoid making statements in Voice Mail that would not reflect favorably on the employee or American Media Institute if disclosed in court or elsewhere.

In order to avoid accidentally disclosing message contents to unauthorized listeners, employees should not listen to Voice-mail messages while using the speakerphone feature.

Indeed, many employees find another employees' use of the speakerphone to be disruptive. So that feature should only be used in the conference room, with the doors closed.

Any employee who discovers misuse of the Voice Mail system should immediately contact general counsel.

Violations of American Media Institute 's Voice Mail policy may result in disciplinary action up to and including discharge.

American Media Institute reserves the right to modify this policy at any time, with or without notice.

Employees are required to sign a Voice Mail Policy Acknowledgment Form as a condition of employment. The form is to be signed on acceptance of an employment offer by American Media Institute.

## VOICE MAIL POLICY ACKNOWLEDGMENT FORM

I acknowledge that I have received a copy of American Media Institute's Voice Mail Policy. I agree to read it thoroughly and agree that, if I do not understand any policy or provision in the policy, I will seek clarification from the Human Resources Department.

I understand that my use of American Media Institute 's Voice Mail System constitutes my consent to all the terms and conditions of that policy.

In particular, I understand that (1) the Voice Mail system and all information transmitted by, received from, or stored in that system are the property of American Media Institute; (2) the system is to be used only for business purposes and not for personal purposes; and (3) I have no expectation of privacy in connection with the use of the Voice Mail system or with the transmission, receipt, or storage of information in that system.

I agree not to use a code, access a file, or retrieve stored communications unless authorized. I agree not to use speakerphone unless in the conference room, with the doors closed, in order to avoid disrupting the quiet needed by other employees to do their work. I acknowledge and consent to American Media Institute monitoring my use of the Voice Mail system at any time at its discretion, including listening to all Voice Mail entering, leaving, or stored in the system.

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_



## USE OF COMPANY EQUIPMENT AND COMPUTER SYSTEMS

The Company provides any supplies, equipment and materials necessary for you to perform your job. These items are to be used solely for the Company's purposes. Employees are expected to exercise care in the use of Company equipment and property and to use such property only for authorized purposes. Loss, damage to, or theft of Company property should be reported at once to general counsel. Negligence in the care and use of Company property may be considered grounds for discipline, up to and including termination.

The Company's equipment—i.e., such as telephone, postage, facsimile and copier machines-- is intended to be used for business purposes.

Upon termination of employment, the employee must return all Company property, equipment, work product and documents in his or her possession or control.

### Use of the Company Computer System

It is the policy of American Media Institute that its computers and software are to be used solely for business purposes. Employees are not allowed to personal use of the computer system. **Employees are strictly forbidden from installing software on the system.** Further, this policy reaffirms that the Company's employees have no reasonable expectation of privacy with respect to any computer hardware, software, electronic mail or other computer or electronic means of communication or storage, whether or not employees have private access or an entry code into the computer system. The Company reserves the right to monitor the use of its computer system.

### Telephone Use

Because a large percentage of our business is conducted over the phone, it is essential to project a professional telephone manner at all times.

Although American Media Institute realizes that there are times when

employees may need to use the telephone for personal reasons, they are expected to use good judgment in limiting the length and frequency of such calls. Additionally, no international personal calls may be made on Company phones without prior approval from an employee's supervisor.

## **INTERNAL INVESTIGATIONS AND SEARCHES**

From time to time, American Media Institute may conduct internal investigations pertaining to security, auditing or work-related matters. Employees are required to cooperate fully with and assist in these investigations if requested to do so.

Whenever necessary, in the Company's discretion, work areas (i.e., desks, file cabinets, etc.) and personal belongings (i.e., brief cases, handbags, etc.) may be subject to a search without notice. Employees are required to cooperate.

## **REFERENCE CHECKS**

All inquiries regarding a current or former American Media Institute employee must be referred to general counsel.

Should an employee receive a written request for a reference, he/she should refer the request to American Media Institute Management. No American Media Institute employee may issue a reference letter to any current or former employee without the permission of general counsel.

Under no circumstances shall an American Media Institute employee release information about any current or former American Media Institute employee or contractor over the telephone. All telephone inquiries regarding current or former employees or contractor of American Media Institute must be referred to general counsel.

In response to an outside request for information regarding a current or former American Media Institute employee or contractor, American Media Institute Management will furnish or verify only an employee's name, dates of

employment, job title and department. No other data or information regarding any current or former American Media Institute employee, or his/her employment with American Media Institute, will be furnished unless the employee authorizes American Media Institute in writing to furnish this information and also releases American Media Institute from liability in connection with the furnishing of this information (unless American Media Institute is required by law to furnish any information).

## **TAPE RECORDING POLICY**

When operating from our Virginia newsroom, employees are encouraged to record (and submit for transcription) all source interviews and business conversations for fact-checking and verification purposes.

Outside of Virginia, or any known “one-party consent state”, employees are discouraged from recording telephone interviews in places where such recordings may be illegal.

## LEAVING AMERICAN MEDIA INSTITUTE

### RESIGNATION

When an employee decides to leave, general counsel would like the opportunity to discuss the resignation before final action is taken. American Media Institute often finds during this conversation that there may be a better alternative. If, however, after full consideration, the employee decides to leave, it is requested that he or she provide the Company with a written two-week advance notice. (Vacation days or personal days may not be included in the two-week notice period).

If, as sometimes happens, American Media Institute Management wishes the employee to leave before the end of the two-weeks' notice period, the employee may be paid for the remainder of that period.

**DISMISSALS** Every American Media Institute employee has the status of "employee-at-will," meaning that no one has a contractual right, express or implied, to remain in American Media Institute 's employ. American Media Institute may terminate an employee's employment, or an employee may terminate his/her employment, without cause, and with or without notice, at any time for any reason.

**The following guidelines may be applied at the discretion of American Media Institute 's MANAGEMENT:**

#### **Immediate Dismissals/Misconduct**

Any employee whose conduct, actions or performance violates or conflicts with American Media Institute 's policies may be terminated immediately and without warning. For example:

- Breach of trust or dishonesty
- Felony conviction

- Willful violation of an established policy or rule
- Falsification of Company records
- Gross negligence
- Insubordination
- Violation of the Anti-Harassment and/or Equal Employment Opportunity Policies
- Undue and unauthorized absence from duty during regularly scheduled work hours
- Deliberate nonperformance of work
- Larceny or unauthorized possession or use of property belonging to any co-worker, visitor, or partner of American Media Institute
- Unauthorized possession, use or copying of any records that are the property of American Media Institute
- Excessive absenteeism or lateness.
- Marring, defacing or other willful destruction of any supplies, equipment or property of American Media Institute
- Failure to call or directly contact your supervisor when you will be late or absent from work
- Fighting or serious breach of acceptable behavior
- Violation of the Drug Policy
- Theft
- Violation of the Company's Conflict of Interest/Outside Employment Policy and/or Security and Confidentiality Policies
- Leaving the work premises without authorization during work hours
- Sleeping on duty

This list is representative of the types of activities that may result in disciplinary action. It is neither exhaustive nor comprehensive and does not change the employment-at-will relationship between the employee and the Company.

In the event of dismissal for misconduct, all benefits end at the end of the month, unless otherwise decided by general counsel.

## **Discipline Other Than Immediate Termination**

All employees are expected to meet American Media Institute 's standards of work performance. Work performance encompasses many factors, including attendance, punctuality, personal conduct, job proficiency and general compliance with the Company's policies and procedures.

If an employee does not meet these standards, the Company may, under appropriate circumstances, take corrective action other than immediate dismissal.

The intent of corrective action is to formally document problems and to provide the employee with a reasonable time within which to improve performance. The process is designed to encourage development by providing employees with guidance in areas that need improvement, such as poor work performance, attendance problems, personal conduct, general compliance with the Company's policies and procedures and/or other disciplinary problems.

## **Written Warnings**

The supervisor should discuss the problem with the employee and/or general counsel and present a written warning to the employee. This should clearly identify the problem, outline a course of corrective action, and specify a definite time frame. The employee should clearly understand both the corrective action required and the consequence (i.e., termination) if the problem is not corrected or recurs. The employee should acknowledge receipt of the warning and add their own comments of their own before signing it. A record of the discussion, the warning, and the employee's comments should be placed in the employee file in the Human Resources Department or CFO's office.

## **POST RESIGNATION/TERMINATION PROCEDURES**

### **Exit Interview**

General Counsel is responsible for scheduling an exit interview with a terminated

employee on his or her last day of employment and for arranging the return of Company property including:

Office keys Company-issued credit cards Company manuals Any additional Company-owned or issued property (including passwords, phones, and computers)

### **Final Paycheck**

Employees leaving the Company must return to general counsel or his designate office keys, corporate credit cards, etc., before their final paycheck can be issued. This final paycheck will be mailed during the next regular pay period. If there are unpaid obligations to the Company, the final paycheck shall reflect the appropriate deductions.