

Annual statement to the Independent Press Standards Organisation (IPSO)

From: Independent News & Media (Northern Ireland)

Period covered: 1 Jan 2017 – 31 Dec 2017

*INM Ltd
Clarendon Dock
33 Clarendon Road
Belfast*

Introduction

Independent News & Media is the largest newspaper publisher in Northern Ireland, with offices currently situated at Belfast Telegraph House, Clarendon Dock, 33 Clarendon Road, Belfast BT1 3BG.

The company publishes the Belfast Telegraph and Sunday Life newspapers, which circulate in Northern Ireland, the associated website www.belfasttelegraph.co.uk and a digital edition of the Belfast Telegraph. It also publishes a range of other digital products including NIJobFinder.co.uk and PropertyNews.com. The company is also a leading commercial printer, printing and distributing newspapers, including UK nationals, across Ireland.

Independent News & Media in Northern Ireland is part of Dublin-based Independent News & Media, publishers of the Irish Independent and other titles in the Republic of Ireland.

The publisher's responsible person for IPSO is associate editor Martin Hill. This report was compiled by group head of news Darwin Templeton, who was the responsible person during 2017.

Our editorial standards

INM fully subscribes to the principles of UK industry best-practice including IPSO's advice and guidance.

Editorially, our guiding documents are the Editors' Code of Practice, along with the Editors' Codebook, and training is given to journalists (including on recognised journalism courses). The latest version of the Editors' Code has been circulated to journalists and they have been reminded of the existence of a 'whistleblowers' hotline for anyone who feels that they have been asked to carry out an unethical action.

At a corporate level, our guiding principles are contained in the group-wide policy document "*INM Plc – Code of Conduct*", a copy of which is attached with this submission. This policy document sets out the standards of behaviour expected of all employees and includes an ethics telephone hotline for staff.

Both INM titles are happy to seek both pre- and post-publication guidance from IPSO. Senior staff have been issued with daytime and out of hours phone numbers in particular for pre-publication guidance should it be required.

Editorial managers are expected to have detailed legal, ethical and regulatory knowledge.

Verification of stories follows the standard journalistic model:

1. Information is gathered and evaluated
2. The editorial value is considered and a legal/ethical/public interest view is taken as required
3. A decision is made on whether to proceed with the pursuit of the story
4. If at all possible, which is in almost all cases, the subject of the allegation is given a chance and adequate time to respond
5. Depending on response, a decision is then made on the merits of publication and whether the article meets the legal, ethical, editorial and commercial tests for publication.

The company also employs an editorial legal counsel, Mr Paul McDonnell, a former partner in the respected Belfast law firm McKinty & Wright, who has been involved in many of the leading media law cases in Northern Ireland over the past few decades.

Mr McDonnell provides the Belfast Telegraph and Sunday Life with specific pre- and post-publication legal advice on matters such as defamation, privacy, contempt, copyright and intellectual property rights and has assisted with responses to complaints. He is regularly called upon, particularly to advise on difficult or challenging stories and is of course given full details on the nature of information gathered and all attempts at verification. Final authority for publication rests of course with title editors.

In the small number of occasions where covert filming is deployed, mainly by Sunday Life journalists, editorial managers are also expected to take special cognisance of rules and sensitivities, and to debate and record reasons why covert filming is permissible.

In 2017, Sunday Life undertook covert filming on two occasions. In the first, a reporter was investigating the recruitment of vulnerable women into prostitution.

In the second, a reporter took undercover footage of a woman who was offering cosmetic surgery despite facing legal action from dozens of patients after the collapse of a previous company run by her.

On both occasions, the decision to carry out undercover filming was taken after consultation between the editor and senior editorial staff and it was deemed appropriate under the public interest exception to Clause 10 (Clandestine Devices and Subterfuge)

In December 2017 the company appointed an associate editor, Martin Hill, who serves as a contact point for communications with IPSO and oversees the handling of IPSO and non-IPSO complaints by both the Belfast Telegraph and Sunday Life to ensure that they are addressed consistently and correctly and that company policy is followed.

Our complaints handling process

Complaints can be accepted in writing, by email or telephone to reporters, senior executives, the editorial secretary or directly to editors. Reporters must escalate the complaint to a manager almost immediately. A complaints protocol exists which provides written instructions to staff on how to deal with complaints (**attached**).

Editorial complaints route, Belfast Telegraph: complaints are directed to the editor, who delegates the day-to-day investigatory and procedural work to the associate editor.

This pattern is mirrored for both IPSO and non-IPSO complaints, where the associate editor will investigate and report to the editor.

Remedies can include corrections and verbal or written communications to the complainant defending or apologising etc as appropriate.

We still find that many complainants go directly to lawyers, leading to a relatively high number of letters of claim. Indeed, a number of complaints to IPSO in 2017 came via law firms.

Editorial complaints route, Sunday Life: the system is similar to the Belfast Telegraph's although the editor and head of news are the key figures.

Records of editorial complaints and their outcomes: All IPSO complaints and their outcomes

are recorded on title complaints registers (**attached**), and all legal complaints are recorded on a single legal provisions risk register.

A non-IPSO complaints file is maintained by the Belfast Telegraph, which outlines non-IPSO/non-legal complaints received and actions taken.

How we seek to resolve editorial complaints: Wherever possible complaints are sought to be resolved by agreement with the complainant. Where this is not possible, the complaint is advised about IPSO, its work and given its contact details.

What information we provide to readers, and where, about internal and IPSO complaints processes: Both the Belfast Telegraph and Sunday Life carry details of how to make a complaint on page two of each edition, which also sets out contact details for IPSO and explains the IPSO process.

Online, every web page also features a 'complaints' button which [directs to a page titled](#): “How to make a complaint – Belfast Telegraph and Sunday Life”. As with print, the thrust of this is to complain first to the editor. If the complainant remains unsatisfied, there is also a direct link to IPSO's website. An example of this link is attached.

Our training process

The following training was conducted in the relevant period:

All new editorial staff receive a copy of the Editors' Code of Practice and are advised of company policy on editorial standards. Existing staff were given the updated Code in December and advised of the key changes that had been made. A link to the Code has also been added to the editorial section of the company Intranet.

Staff have also received refresher training on legal and ethical issues that was delivered by the editorial legal counsel Paul McDonnell. This training included defamation, covering recent developments; the implications of using social media platforms and the company's liability in respect of user generated content.

The sessions also included privacy, including recent case law, the implementation of the Editor's Code of Practice and the specific provisions relating to children and social media.

Our record on compliance

During the period in question, IPSO upheld two complaints against the Belfast Telegraph. The title fully complied with IPSO's post-determination requirements in print and online as per INM's contractual obligations.

BELFAST TELEGRAPH

The register of complaints against the Belfast Telegraph which were adjudicated upon in the period is attached.

Two complaints were upheld in this period. **A man v Belfast Telegraph** (IPSO 13548-17) referred to an article, published online on June 21 2016 in which a woman gave an interview describing

years of harassment by a former partner.

Her former partner, who was the complainant, denied the allegations, claimed that he had been identified and said that he had not been given a right to reply pre-publication. He claimed breaches of Clause 1 (Accuracy) and Clause 2 (Privacy).

The Complaints Committee upheld the complaint under Clause 1, and required the title to publish its adjudication online. The complaint on Clause 2 was not upheld.

The second complaint which was upheld was **Historical Institutional Abuse Inquiry v Belfast Telegraph** (IPSO 01557-17). It referred to two articles published on February 11 and 13 2017 in which it was claimed that the inquiry had ignored allegations concerning a former child psychiatrist.

The complainant alleged that these claims were inaccurate and that it had not been given an opportunity to reply to the inaccuracies. It claimed breaches of Clause 1 (Accuracy)

The Complaints Committee upheld the complaint under Clause 1 (Accuracy) and ordered the publication of their adjudication in print and online.

As a result of the IPSO adjudications, editorial staff in the Belfast Telegraph were reminded of the need, wherever possible, to offer a right to reply to anyone against whom allegations are to be published and our internal training was amended to highlight this.

Both of the articles against which complaints were upheld were written by non-staff contributors for features and opinion sections and as a result we have altered our processes to ensure that material for these sections is subject to the same editorial and legal checks as news content. This involves final sign-off by the Associate Editor or in his absence another senior executive.

Later in the year, IPSO raised concerns with us about the timeliness of some responses to complaints.

In relation to these particular instances, we provided a comprehensive explanation in respect of the reasons for that and the difficulties often faced by us in properly investigating queries raised by IPSO. We were grateful that IPSO appreciated the particular difficulties that we faced in relation to certain investigations.

We also agreed that, going forward, we would write to IPSO in respect of any matter where we are unable to comply with any timetable stipulated so that we complied with the guidelines and would liaise with IPSO generally in respect of any particular difficulties we may experience. We were also grateful for IPSO's offer of support in respect of any matter where we require assistance.

SUNDAY LIFE

The register of complaints against Sunday Life which were adjudicated upon in the period is attached.

No complaints against the Sunday Life were upheld in this period.

Attachments:

INM Code of Conduct

Protocol on receiving complaints

Belfast Telegraph IPSO complaints adjudications Jan – Dec 2017

Sunday Life IPSO complaints adjudications Jan – Dec 2017

Screengrab of web page with complaints button

Links to upheld complaints:

Belfast Telegraph

A man v Belfast Telegraph (IPSO 13548-17)

<https://www.ipso.co.uk/rulings-and-resolution-statements/ruling/?id=13548-17>

Historical Institutional Abuse Inquiry v Belfast Telegraph (IPSO 01557-17)

<https://www.ipso.co.uk/rulings-and-resolution-statements/ruling/?id=01557-17>

INM (NORTHERN IRELAND)

Belfast Telegraph IPSO complaints register 2017

IPSO complaint number, date, and name	Details of complaint	Editor's Code clause	How the complaint was received	Outcome
IPSO Ref 09842-16/09843-16 Date 09.01.17 [REDACTED]	Article on RHI scheme misleading and inaccurate	1. Accuracy	Formal complaint to IPSO	No possible breach of code
IPSO Ref 14417-16 [REDACTED]	Use of address and publication of photograph breached privacy	2. Privacy	IPSO complaint 29/12/16	No possible breach of code

23.01.17				
IPSO ref 00587-17 [REDACTED]	Query over use of photograph from Holiday Show exhibition	N/A	Complaint to IPSO	Resolved with complainant
21.01.17				
IPSO 01516-17 Eoin Tennyson 24.02.17	Mr Tennyson alleged information contained in a letter was inaccurate	1 Accuracy	IPSO complaint	Resolved with IPSO mediation
IPSO Ref: 00135-17 [REDACTED] Date: 06.01.17	[REDACTED] alleged use of inaccurate information in a report of an inquest, use of son's name and age	1. Accuracy 2. Privacy 6. Children	Email to newspaper, followed by complaint to IPSO.	Adjudication 27.02.17 No breach of code in Clauses 1, 2 or 6.

<p>IPSO Ref 01557-17</p> <p>██████████ on behalf of the Historical Institutional Abuse Inquiry.</p> <p>24.02.17</p>	<p>Complainant alleged publication of inaccurate material and failure to give a right to reply in stories published on Feb 11 and 13 2017.</p>	<p>1 Accuracy</p>	<p>Email to newspaper followed by complaint to IPSO</p>	<p>Complaint upheld under Clause 1.</p> <p>Sanction: Ajudication published.</p>
<p>IPSO ref 02416-17</p> <p>Shauna O’Neill</p> <p>27.03.17</p>	<p>Complaint in relation to coverage of funeral of Bronagh Kinney on 23.02.17</p>	<p>1. Accuracy 2. Privacy 4 Intrusion 6 Children 10. Subterfuge</p>	<p>Complaint to IPSO</p>	<p>IPSO mediated resolution with complainant. Apology published.</p>
<p>IPSO ref 12715-17</p> <p>██████████</p>	<p>Story published on terrorist threat in Belfast was</p>	<p>9. Reporting of crime</p>	<p>IPSO complaint</p>	<p>No possible breach of code</p>

<p>██████████</p> <p>12.06.17</p>	irresponsible			
<p>IPSO Ref 13548-17</p> <p>“A man”</p> <p>19.06.17</p>	Complainant alleged inaccurate information, failure to offer a right of reply and breach of privacy in article published on June 21 2016.	<p>1 Accuracy</p> <p>2. Privacy</p>	Email to newspaper and complaint to IPSO	Complaint upheld. Sanction: Ajudication published online.
<p>IPSO Ref 16953-17</p> <p>██████████</p> <p>02.08.17</p>	Complaint in relation to article published on the death of ██████████	<p>1 Accuracy</p> <p>4. Intrusion into grief or shock</p> <p>5. Reporting suicide</p>	IPSO complaint	Not appropriate to take forward without knowledge and consent

				of family
IPSO Ref 17919-17 [REDACTED] 22.08.17	Complaint relating to coverage of inquest into son's death	1 Accuracy 2 Privacy 4. Intrusion into grief and shock	Complaint to IPSO	Responded directly to [REDACTED] [REDACTED] No further action taken.
IPSO ref 20315-17 [REDACTED] 23.11.17	Inaccurate information in stories on Nov 4 and Nov 14 2017 and also breach of privacy	1. Accuracy 2. Privacy	Complaint to IPSO	Complainant withdrew from mediation
IPSO Ref 19984-17 [REDACTED] 30.11.17	Personal information contained in report on 10.11.17	2.Privacy	Complaint to IPSO	No possible breach of code

Sunday Life IPSO Complaints 2016				
IPSO complaint, date, name and number.	Details of complaint.	Editors' code clauses.	How complaint was dealt with.	Outcome
IPSO ref 14380-17 Alex Easton MLA 11.01.17	Mr Easton alleged that a series of articles relating to a reference he gave for David 'Dee' Stitt were inaccurate and did not reflect his position	1 (accuracy)	Emails to complainant followed by IPSO investigation.	Ruling by Complaints Committee. The complaint was not upheld.
	Complainant claimed she had been harassed by a SL photographer & journalist on Jan 29 as she left a court hearing.	3 (harassment)	Emails to & from complainant before the case was referred to the Complaints Committee.	The complaint was not upheld.
██████████ IPSO ref 02925-16. Articles published on April 10 and May 22, 2016. Complaint received May 25.	SL reported ██████████ & her husband's convictions on animal neglect charges. She said they had been harassed outside court & report was inaccurate.	1 (accuracy), 2 (privacy) & 3 (harassment).	Emails to/from the complainant and IPSO officer. SL rejected all of ██████████ complaints.	Following correspondence ██████████ withdrew her complaint in July.

COMPLAINTS PROTOCOL FOR ALL INM NI STAFF

INTRODUCTION:

This document sets out the protocol for all members of staff to follow for the receiving and referral onwards of complaints about articles published by Belfast Telegraph/Sunday Life, and the behaviour of its journalists.

It applies to ALL complaints whether received in person, by phone, letter or email.

PROCEDURE:

1. **INITIAL CONTACT:** The receiver must note and forward on the following: date/time, complainant's name, complaints address, phone number and email address (where applicable); nature of the complaint; date/page/headline/url of article complained of and a summary of the complaint. It is important that any threats of legal action are also noted.
2. **SUMMARY:** This must comprehensively note all aspects of the complaint including any comments made about standards and ethics of the newspaper and the behaviour of individual reporters (including if the receiver of the complaint is the reporter involved in publication).
3. **TONE:** The complaint should be received in a businesslike manner. It is not acceptable to be rude, hostile, indifferent, delaying, provocative, etc
4. **WORDS:** Words used to the complainant must reflect the Belfast Telegraph/Sunday Life's complaints policy. This is that "every complaint will be investigated and a response will be given to each and every complainant". Also that the newspaper "subscribes to the Editors' Code of Practice and to the press complaints body, IPSO". The complainant must be reassured that complaint will be treated seriously and will be passed to the editor or the editor's representative within two hours (or first thing in the morning if late at night).
5. **REFERRAL ONWARDS:** This must be done to your line manager as soon as possible, ideally within minutes. If a reply is not forthcoming, follow it up with a phone call for verbal confirmation. **NEVER ASSUME AN EMAIL HAS BEEN SEEN UNTIL YOU RECEIVE CONFIRMATION.** Keep confirmation emails in case these are required in the future.

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Independent
News & Media PLC

INM Plc. Code Of Conduct



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Introduction

INM is committed to maintaining the highest standards of ethical behaviour. Business operations within INM are often complex and good ethical behaviour does not boil down to a series of do's and don'ts. Even the appearance of improper behaviour can have serious repercussions on INM's reputation. This code outlines some of the key principles underpinning ethical behaviour in INM. It applies to all employees (which for the purpose of this code includes agents, contractors, consultants, board members and any other parties representing/performing services on behalf of the INM Group).

You should familiarise yourself with this code and apply the principles in your day to day business dealings in INM. Managers have additional "dos" and "don'ts" to promote the code. They should lead by example and ensure that employees under their supervision are aware of our ethical values. Managers should be supportive of those individuals who raise questions in this area or have ethical concerns.

The code is by no means exhaustive and serves to act as a guide in this area. Ultimately the ethical culture of INM depends on the moral standards of its employees, their ability to exercise good judgement and their willingness to flag ethical concerns when they arise.

This code may be amended from time to time and any revised version of the code will be published on the Group website.



Our Responsibilities

We are committed to acting in the best interests of our stakeholders which includes:

Commitment to our employees

INM's growth as a leading international newspaper and communications group has been underpinned by the dedication and commitment of its employees. We recognise that they are central to our organisation. We embrace diversity, seek to reward performance and are actively committed to promoting the well being of our employees.

Commitment to our customers

The core philosophy of our business continues to be meeting our customers' needs. From its local Irish newspaper origins, the INM Group has expanded to encompass a multi-ethnic, geographically and culturally diverse audience. While our product offering has expanded to include printing, distribution, wholesaling and digital our commitment to offering the highest level of quality and service to our customers remains steadfast.

Commitment to the market place

We aim to compete vigorously but fairly in the market place and in a manner that complies with all relevant laws and regulations.

Commitment to our shareholders

In INM we are guided by our duty to act in the best interests of INM and our shareholders. By promoting long-term stable growth the business aims to build enduring shareholder value. We recognise that our relationship with our shareholders is built on trust and transparency. We are committed to maintaining the highest standards of corporate governance and ensuring the correct mix of experience at Board level, for the optimum strategic and operational governance of the INM Group.

Commitment to our community

From the outset the INM Group has always been acutely aware that no organisation can survive, let alone flourish, in a vacuum, without reaching beyond itself to make a deeper contribution to the well being of society. This commitment is at the heart of the INM Group's ethos and underpins how we conduct our business, mindful of our corporate, social and environmental responsibilities to sustainable development.



Our Commitments in Action

Commitment to our employees

Discrimination and Harassment

We recognise that our employees are one of our greatest assets. They are the face of our business and, combined with our market-leading brands, are the point of recognition for our many millions of consumers.

Our human resource policies reflect the central role that our employees play in our organisation. These policies focus on ensuring equal opportunities for all and promote diversity through our workforce to the greatest possible extent. We aim to positively engage with employees in a way that will assist them to achieve their maximum potential.

Individuals within INM have the right to work in an environment which is free from discrimination and harassment. Employees should be treated with respect and dignity at all times. All of our employees are recruited and promoted on the basis of suitability for the job.

Discrimination/harassment on grounds such as age, race, religion, gender, sexual orientation, marital or family status, disability or, in Ireland, membership of the traveller community is unacceptable and employees who are found to be in breach of this principle may be subject to disciplinary action.

Both managers and employees in INM are responsible for creating and maintaining a workplace free from discrimination and harassment.

If you are subject to harassment or feel discriminated against, please speak up by using one of the resources listed in the section on “obtaining advice and raising concerns”. INM does not tolerate retaliation against any employee who reports a concern in good faith, even if that allegation is found to be unsubstantiated.

Personal Information

The business is mindful of the fact that it holds confidential and sensitive data relating to its employees. Appropriate measures should be in place to ensure that such information is protected and never used for improper means. Personal information should always be managed in accordance with our employment policies, relevant data privacy and protection laws and best practice.

Health and Safety

We are committed to safeguarding the health and safety of those people who work in or visit our organisation by providing appropriate training and professional expertise where required. In addition, each of us has an individual responsibility to ensure that health and safety is never compromised. To maintain a safe working environment employees are expected to:

Comply with all applicable local legislation in this area;



- Follow guidelines issued by the business with regard to health and safety;
- Understand the hazards associated with their job and workplace and ensure that they are being adequately managed;
- Ensure that employees and contractors work in a safe manner and use appropriate health and safety equipment as required;
- Never work while under the influence of alcohol, illegal drugs or misused prescription drugs;
- Raise any health and safety concerns that they become aware of even if it is not within their area of responsibility; and
- Report accidents, near misses, breaches of health and safety as soon as possible.



Commitment to our customers

Editorial principles

A newspaper's greatest assets are its integrity and credibility. INM requires its editors and editorial staff to be professional, courageous and aggressive in pursuit of truth in the news. It is also committed to independence, fairness and balance in informing people of events and issues which they have a right to know. This right is balanced by compliance with the laws of defamation and privacy and adherence to the principles of taste, balance and accuracy. INM titles will not promote or encourage illegal activities or violence to achieve or further political objectives or foment violent activities aimed at undermining the lawful institutions of the country. These principles apply equally to content disseminated via the web, mobile and other electronic devices.

Confidentiality

As part of our business relationship with our customers we are entrusted with personal and sensitive data. Subject to any legal requirement to disclose information, we are committed to ensuring that such information is safeguarded at all times, is never shared with unauthorised parties and is maintained in accordance with relevant data privacy and protection laws as well as best practice. Employees are expected to be mindful of their responsibilities in this area and should ensure that the usage, storage and transfer of such information is managed effectively and securely and in accordance with this code and any policies that may apply from time to time.

Marketing and Promotion

We should ensure that all sales and promotion practices are truthful, balanced and do not mislead our customers. Any competitions should be conducted in a manner which is open, honest and legal.



Commitment to the marketplace

Competitive information

We should ensure that any information we obtain regarding competitors activities is ethical and in compliance with local laws and regulations. We should never use improper means to obtain unauthorized or confidential information about our competitors. This can include deception, obtaining information from current or former employees of competitors, relying on personal or professional relationships or offering inducements to gather information on a competitor which is not in the public arena and which would be considered sensitive.

Colluding with competitors

We should never enter into an arrangement with competitors, formal or informal, with the intent or effect of limiting competition. Such an arrangement could include setting prices, fixing terms and conditions, limiting production, dividing up markets or boycotting customers and/or suppliers. Given that INM engages with its competitors as part of its service offering, we should be highly vigilant that any dealings with competitors do not contravene local competition laws. Violating these laws can have severe implications for both our organisation and individuals involved. Given the complexities in this area you are encouraged to raise any concerns you may have on this area with your manager.

Communications

As a business we need to ensure that information disseminated to the public is accurate, consistent, timely and in compliance with local laws and regulations. To protect our company's reputation it is important that external communications are handled by designated spokespeople for the INM Group. We should not make any representations on the INM Group's behalf unless it is part of our job responsibility or where instructed to do so by our manager. If any employee has any doubts regarding communication of information to external stakeholders they should consult with their manager.



Commitment to our shareholders

Company assets

Company assets such as cash, inventory, computers, telephony, and IT hardware and company vehicles are an essential element of INM operations. We should ensure that these company assets are used appropriately and for purposes intended. Proper measures should be in place to protect them from loss, theft, damage and misuse. Electronic communication systems within INM should be used sensibly. It is unacceptable to use INM systems to send unauthorized communications or conduct business for another organization. Under no circumstance should we use INM systems to view or download content that is illegal harassing or insensitive. Employees should have regard to any applicable local laws and company policies on email and internet use. When using these systems, your rights to privacy are limited. Usage of INM's information systems may be subject to monitoring to protect our business, reputation and equipment from misuse. Intellectual property such as trademarks, content, copyrights, domain names, trade secrets and other assets provide INM with a competitive advantage over its competitors. We should take all reasonable steps to ensure that INM's intellectual property is protected. We should also respect the intellectual property of others and ensure it is not infringed.

Accurate and complete records

A wide range of stakeholders including investors, banks, tax authorities, customers and suppliers rely on the integrity of our disclosures and business records. Incomplete or inaccurate information impacts on our credibility and reputation. Falsifying or misrepresenting information can constitute fraud.

Employees within INM must ensure that records maintained are accurate, timely and complete. Inflating key metrics such as sales or circulation, shifting results between reporting periods or maintaining off balance sheet accounts is never acceptable and can result in investigations, fines, legal actions and significant damage to reputation (as well as disciplinary action for the relevant employee). If you suspect a potential problem in this area you are encouraged to raise your concern through the relevant channels outlined in the section "Raising a concern". Within INM there is a policy of no retaliation. This means that INM will not penalise or tolerate retaliation against any employee who reports a concern in good faith, even if that allegation is found to be unsubstantiated.

Confidential information

Confidential information is information which is not available to the public and can take many forms such as strategic plans, intellectual property, and financial information, contractual arrangements with suppliers and business partners and subscriber details. We must take reasonable steps to ensure that confidential information is adequately safeguarded. Such information should never be used for purposes other than legitimately carrying out one's job (and then, only for the purpose for which the information was received) and should only be shared with internal and external parties who have been authorised to receive such information. In safeguarding confidential information we should:

- Ensure that information held is accurate and current;
- Take reasonable steps to secure confidential information;
- Communicate information only to those who are authorised to receive it;



- Be mindful of discussing sensitive information in public; and
- Ensure that information is held in accordance with data privacy and protection laws and any special requirements that may apply to the relevant information (e.g. where the information is subject to restrictions under a non-disclosure or confidentiality agreement)

Insider trading

Inside information relates to non public information which would be likely to significantly influence an investor's decision to buy, sell or hold securities in that company or to affect the price generally of securities or related securities in that company. The use or disclosure of inside information to make investment decisions is illegal in many countries. Examples of inside information can include financial results, new products, changes in the Board and acquisitions and divestures (or any plans or information with respect thereto).

As part of our work, we may become aware of inside information relating to INM or companies that it does business with. We should never use such inside information or share it with others for the purpose of making an investment decision until such information has become public (even after an employee or agent no longer works with INM or the INM Group).

Employees are prohibited from spreading false or misleading information about the company or engaging in activities designed to manipulate the price of securities in INM. Breach of this principle may result in disciplinary action. The above applies to INM or any its subsidiaries or investments that the inside information pertains to.

Conflicts of interest

A conflict of interest may occur when our personal interests interfere, or appear to interfere, with our ability to perform our jobs effectively and without bias. We are expected to act in the best interests of the INM Group as well as, in the case of directors, in accordance with fiduciary duties owed to those companies on which a director sits on the board. Business decisions should not be affected by our personal interests that could arise as a result of financial interests in suppliers, competitors or customers. We should not work simultaneously for a competitor, customer or supplier without obtaining the necessary authorisation from our manager.

In order to avoid potential conflicts of interest we should be mindful of any business arrangements where family members or close personal relationships may be involved. These relationships can include but are not limited to relatives, spouses, partners, in-laws and individuals living at your address. We must not put ourselves in a situation where such relationships could interfere with our ability to make objective decisions. Any arrangements where you have a direct/indirect reporting line with any of the above parties should be communicated to your manager.

Even the appearance of a conflict of interest may lead to reputational damage. If you have a potential conflict of interest or need clarification on this matter consult your manager for advice. Alternatively refer to the section "Raising a concern" for other channels through which you can raise concerns.

Records management

Good records management is important for effective and efficient operations as well as protecting important and sensitive information. Records can take many forms including written,



printed, and recorded materials, as well as electronic records (i.e., emails and documents saved electronically). Records should be managed in accordance with business, legal, financial and regulatory requirements and with any INM specific records management policies applicable from time to time.

Where records contain information relating to a current or anticipated legal or regulatory action they should be preserved even if they would normally be destroyed.

Records should not be held for longer than expected. When destroying records we should exercise care. Paper documents should be shredded or rendered unreadable. Electronic records should be erased. If you have any questions on the area of records management please consult your manager.

Co-operating with auditors

During the course of its business INM is subject to internal and external audits. These include financial reporting, ABC circulation and tax audits. We are expected to fully co-operate with auditors. Falsifying business records, withholding information, making misleading statements or otherwise interfering with an audit is a violation of the code and may lead to disciplinary action.



Commitment to our community

The Law

INM believes in full compliance with both the spirit and letter of the law in the countries in which it operates. Failure to adhere to local laws, rules and regulations can result in investigations, fines, penalties and damage to our reputation. Where our policies and procedures are in conflict with the law we should always follow the law. Employees are not expected to be knowledgeable of every aspect of the law but should be aware of any legal or regulatory requirements which apply to their job. Where in doubt you should seek clarification from your manager.

Social responsibility and environment

As a global multimedia company that reaches millions of consumers each week, we are in a unique position to make a real difference to the communities in which it operates. The INM Group has an extensive track record of supporting large-scale humanitarian causes on both a global and local basis. It supports a wide variety of charitable organisations by making financial contributions and by providing editorial coverage. It also provides significant editorial coverage and support for environmental and health issues.

INM recognises its responsibility in safeguarding its environment for future generations to enjoy. This is achieved by:

- complying at a minimum with all relevant legislation;
- researching and applying best practices in environmental issues facing its sector ;
- evaluating and managing the environmental impact of current and potential future operations;
- conserving natural resources, including energy, raw materials and water; and
- implementing effective and responsible waste management and recycling procedures.

All employees within INM are encouraged to foster a spirit of social responsibility and support relevant environmental efforts undertaken by the INM Group.



Bribery and corruption

In order to protect our reputation and comply with local laws, we should never offer or take a bribe or act in any way that could be considered to be or to induce corruption. Bribes are anything of value including money, gifts, loans, favours, advantages, benefits in kind or entertainment that may influence a business or related decision or appear to do so. This is regardless of whether it is the norm within the country or industry that we are operating in. It applies to our dealings with government and public officials, customers, suppliers, auditors, unions, financial institutions and any other relevant stakeholders.

Small token gifts are acceptable when it is part of business customary practice but they should never be deemed to create an obligation. Cash or cash equivalents such as stocks, bonds and gift vouchers no matter how small should not be accepted or offered to avoid the appearance of bribery.

Political activities and contributions

The business has a general policy of not supporting political candidates or parties. Where an INM business believes that it is in the interest of the Group to support a political candidate or party, approval should be obtained in writing from the regional managing director and the group company secretary informed. Support can relate to direct financial aid but can also include providing benefits in kind or sponsorship. We do recognise the right of our employees to participate in legitimate political activities. These should be kept separate from INM activities. We should not use company assets or resources to support our private political interests.

Obtaining Advice and Raising Concerns

Raising a concern

At times we may have questions or require guidance on certain aspects of the code. It may be as simple as confirming that the current approach being adopted is the correct one. Alternatively we may be aware that the code is being violated and would like to speak to someone about it. The best place to start is by talking to our manager or supervisor. If you feel uncomfortable doing this then there are a number of other channels for raising concerns. These include:

- Local management team
- HR
- Internal Audit
- Group Company Secretary
- Group Chief Financial Officer

Within INM there is a policy of no retaliation. This means that INM will not penalise, or tolerate retaliation against any employee who reports a concern in good faith, even if that allegation is found to be unsubstantiated.

While INM openly encourages its employees to raise concerns, any allegation that is made maliciously



is considered to be a serious offence and may result in disciplinary action.

If you feel that you have been in violation of the code, you are urged to raise this matter immediately through one of the above channels. Admission of code violations will be looked on favourably, however the consequences of such violations will ultimately depend on the nature of the activity involved.

INM Ethics Helpline and Whistle blower Email

There may be instances where we do not feel comfortable raising a concern internally. In such cases we should use the “INM Ethics Helpline”. This is a telephone based reporting tool through which we can raise concerns relating to financial reporting, bribery and corruption. It is monitored solely by the Group Company Secretary. All employees can call 24 hours a day, seven days a week to report any concerns they may have. The contact number is included at the end of this document.

In addition a dedicated email address has been set up to facilitate individuals who wish to raise concerns via email.

The Group Company Secretary and Head of Internal Audit & Risk are joint monitors of the email address and when a concern is raised through this channel Internal Audit will instigate an investigation of any issue arising. The email address is included at the end of this document.

When raising concerns through these channels you are urged to provide as much information as possible so that the concern can be thoroughly investigated. Employees are encouraged to disclose their name and are assured that all calls are treated discretely and effectively. If you do not feel comfortable doing this you may raise a concern anonymously.



Making Ethical Decisions

In some cases making an ethical decision can be very straightforward. However in other situations the decision may be more complicated. When evaluating an ethical dilemma we should ask ourselves the following questions:

- Does it feel right?
- Would I be happy if details of the situation were made public?
- Are any laws being broken?
- Is the health and safety of individuals being threatened?
- Could it harm INM's reputation?

Depending on answers to the above we should seek clarification or raise this concern through one of the appropriate channels.

Support

Further guidance on the area of fraud risk management within INM can be found in the following policies:

- INM Anti-Fraud Policy
- INM Bribery and Corruption Policy
- INM Investigation Policy



Contact Information

- **INM Ethics Helpline**
+353 1 705 5365
- **INM Whistleblowing Email Address**
whistleblowerreporting@inmplc.com

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