

TRIBUNE

Policy Manual & Employee Handbook

TRIBUNE

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TRIBUNE

Part 1

POLICY MANUAL¹

Rule #1: Use your best judgment.

Rule #2: See Rule 1.

That's it. That is the one hard and fast rule. Unless a serious mistake was made when you were hired, you have pretty good judgment.

- You know what it takes to succeed.
- You know that honesty, reliability, commitment, teamwork, and personal responsibility are essential to superior performance.

Tribune is a formidable and historically rich company. Rather than be mired in the history, we prefer to build upon that heritage by reinventing and adapting ourselves to the realities of today. Essentially, as of December 20, 2007, Tribune Company is a new company. Therefore, it's fair to give you some help understanding the culture we will be creating together, and how your judgment will be judged.

We'll give you a few guidelines and examples to help you understand our company focus, and to help you understand some of the rules and policies created by the FCC, IRS and other government agencies, branches and bureaus. However well or poorly formulated some of their rules might be, ***it's bad judgment to break rules that will get us in trouble.***

Clearly, we need rules to live in a civilized society. But rules can be tricky. Sometimes rules serve an obvious purpose and seem to apply in any situation. Situations not contemplated when rules were made occur.

An example is a recent convention in Washington, D. C. A large group wanted an exception to a rule requiring a team of paramedics to be on duty. Such a rule seems like a pretty good idea, but this was a convention of the world's leading medical doctors. In this case, a team of paramedics was just a needless expense, but it was required not because it made sense but because it was "The Rule." The doctors did not get an exemption.

"Because it's always been done that way" and "because it's a rule" and "because I said so" aren't reasons for doing anything unless you've thought about it and it makes sense. There are many old rules and regulations and handbooks and manuals that will no longer be relevant to those working at the Tribune Company of today and the future. As we replace those, we consider this a fresh start. Use Rule #1 as your primary guideline for how we behave, and for every decision we make.

¹ This handbook applies to all non-union Tribune employees. Your boss may give you additional rules and guidelines, and it's good judgment to follow those. Some states, such as California, have laws that apply to some of the policies in this handbook. Of course, Tribune follows such state laws.

Part 2

TRIBUNE COMPANY CORE VALUES

- 1. KEEP YOUR WORD.** If we commit to a viewer or a vendor, a customer or competitor, we keep our word. Especially to each other. So use your best judgment when giving your word, because the expectation is that you will keep it.
- 2. COLLABORATE.** We help each other out. We do what needs to be done, even if "it's not our job." We cooperate with competitors to improve our industry. We work together to grow revenue in the market and the industry. We have the backs of our teammates and we find solutions instead of placing blame.
- 3. NO SURPRISES.** If something isn't going according to plan, communicate it before it's "discovered." Show this respect to your supervisors and expect it from your subordinates. Problems are often less problematic when more people are working on the solution. Secrets make you lonely, and keeping them shows very poor judgment.
- 4. COMPETE.** Play to win. Market shares add to 100%. We can't grow our share of revenue or audience unless someone else's goes down.
- 5. PLAY FAIR.** But remember that there is nothing unfair about taking advantage of a competitor's weakness. It's not unfair to scoop a competitor on a big story or closet them on a key account. Not playing to win is unfair to your teammates and to all of the company's stakeholders.
- 6. TAKE INTELLIGENT RISK.** We are in a period of accelerating change. The riskiest thing you can do is nothing. Doing something just because that is the way it has always been done is only acceptable if you can stop time.
- 7. REWARD SUCCESSFUL PERFORMANCE.** Successful performance should result in bonuses and promotions. Working hard is not the same as being successful. Life isn't always fair. Luck and timing have a great deal to do with success, but over time, rewarding successful performance is the right thing.

- 8. QUESTION AUTHORITY.** In transforming Tribune, you are encouraged to ask your manager, supervisor, business unit head or anyone in Corporate, any question you have regarding the business. Question authority and push back if you do not like the answer. You will earn respect, and not get into trouble for asking tough questions. Remember, you are an employee owner. You have the right and obligation to ask questions.
- 9. SERVE OUR LOCAL COMMUNITIES.** We take our obligation to serve the public interest, need, and convenience seriously. While much of our programming and content is light entertainment, we are committed to serving our communities. When bad weather keeps most inside and away from their jobs, we have a particular obligation to go to work. Emergencies and disasters are times for “all hands on deck.” If this commitment is not in your DNA, Tribune Company may be the wrong place for you. This commitment goes far beyond slogans and marketing. It means that we will do what we can to bond with the audiences who watch, listen to and read the products we deliver and depend on us to provide information and entertainment. It is imperative that we do all we can to make sure they can count on us when being accurately informed is most important. We cannot control the output of networks and syndicators. We are in complete control of how we serve our audience. Nothing short of superlative performance in this area will do.

Part 3

EMPLOYEE MANUAL

1. AT-WILL EMPLOYMENT

- 1.1. Employment with Tribune is at-will unless this relationship has been modified by the specific terms of a contract that's been signed by you and by an authorized representative of the company, or by a collective bargaining agreement.
- 1.2. At-will employment means that either Tribune and/or you can terminate employment at any time for any legal reason, with or without cause.

2. EQUAL EMPLOYMENT OPPORTUNITY STATEMENT

- 2.1. Tribune is an equal opportunity employer.
- 2.2. Tribune wants the best people to work for the company.
- 2.3. Tribune encourages creativity, productivity, intelligence, and a great attitude.
- 2.4. The company intends to actively discriminate based on job performance, ability and attitude.
- 2.5. Discrimination based on gender, age, race, religion, national origin, marital status, sexual orientation, disability, or any other characteristic not related to performance, ability or attitude, protected by federal or state law, or not protected (such as inability to tell a joke, the occasional poor wardrobe choice or bad hair day), is strictly prohibited.

3. DISABILITY STATEMENT

- 3.1. Tribune will make reasonable accommodations if you have a disability and are otherwise qualified to perform your job.
- 3.2. If you need an accommodation, tell your supervisor.

4. HARASSMENT POLICY (SEXUAL & OTHERWISE)

- 4.1. Working at Tribune means accepting a creative, quirky, intelligent, odd, humorous, diverse, opinionated and sometimes annoying atmosphere.
- 4.2. Working at Tribune means accepting that sometimes you might hear a word that you, personally, might not use. You might experience an attitude

that you don't share. You might hear a joke that you might not consider funny. That is because a loose, fun, non-linear atmosphere is important to the creative process.

- 4.3. This should be understood, should not be a surprise and is not considered harassment.
- 4.4. Harassment means being told that a raise, promotion or other benefit is dependent on you going on a date with your boss or some other similar activity.
- 4.5. Making the building too hot, banging on trash can lids or loud bagpipe music are annoyances you can complain about, but this policy is about harassment on the basis of protected characteristics. It's really bad judgment to intimidate, persistently annoy, inappropriately touch, treat people differently because of their protected characteristics, or otherwise make members of our team uncomfortable, no matter how you do it.
- 4.6. Some people don't know the line between lighthearted fun and annoying behavior. If you experience what you believe to be harassment of any kind **SPEAK UP!**
 - 4.6.1. If you feel comfortable, begin by asking the offending party to stop the harassing behavior.
 - 4.6.2. If that doesn't work, take the issue to your supervisor.
 - 4.6.3. If the situation is still not resolved in an appropriate manner, go to Human Resources or any manager or director of the company.
 - 4.6.4. Should the problem continue, or if you are uncomfortable with speaking with someone at your location, call any of the people identified in Section 21.
 - 4.6.5. Tribune will do all it can to make sure your concerns are addressed appropriately, and we'll make sure no one retaliates against you for speaking up.

5. PERSONAL RELATIONSHIPS

- 5.1. Under Rule #1, you may want to think twice before you enter into an intimate relationship with a co-worker. When you start, it might seem like a good idea. It's when you stop, or the wrong people find out (and they will) that you could discover that perhaps it wasn't.

6. INTERPERSONAL CONTACT, IN GENERAL

- 6.1. Have fun and treat each other with respect. This falls under Rule #1.

7. DRUG POLICY

- 7.1. If you use or abuse alcohol or drugs and fail to perform the duties required by your job acceptably, you are likely to be terminated. See Rule 1. Coming to work drunk is bad judgment.
- 7.2. If you do not use or abuse alcohol or drugs and fail to perform the duties required by your job acceptably, you are likely to be terminated.
- 7.3. If government rules and regulations say that drug testing is a condition of holding your job, Tribune is obliged to follow the law and your manager/supervisor will provide you with details.

8. CONFLICTS OF INTEREST

- 8.1. You should know that you have a duty to be loyal to your team.
 - 8.1.1. This means not intentionally taking actions that might hurt your team and not helping someone who is competing with your team.
 - 8.1.2. It's fine to collaborate with competitors to improve our industry or to serve our communities.
 - 8.1.3. It is not fine to help our competitors increase their performance or their revenue in any way that might hurt ours.
 - 8.1.4. Being loyal to your team also means you shouldn't have personal or business dealings that make it difficult to do your job objectively. If you aren't sure whether something you or a close family member is involved in causes a problem, you should let company management know about it.
 - 8.1.5. It also means you shouldn't take for yourself an opportunity that you learn about because of your job unless you get the okay from company management.
 - 8.1.6. Being loyal also means that you protect the company's assets, including our intellectual property.
- 8.2. Payola/Plugola
 - 8.2.1. An obvious conflict of interest is taking anything of value that does not come through the company to promote a commercial venture or product.
 - 8.2.2. The FCC rules prohibit accepting consideration for material aired by licensed media without disclosing the sponsor.
 - 8.2.3. Violating those rules is bad judgment.

9. SAFETY

- 9.1. Tribune will abide by all federal, state and local laws as they apply to the safety, training, health and well-being of our employees.
- 9.2. Your supervisor will tell you about any safety regulations that specifically apply to your job.
- 9.3. If at any time you believe your personal safety is in jeopardy, please notify your supervisor immediately. See Rule #1.

10. OVERTIME

- 10.1. In general, paid only to non-exempt employees at 1.5 times the normal hourly rate for every hour beyond 40 hours worked during a work week, or as otherwise required by your business unit's policies or local or state law.
- 10.2. Paid holidays, vacation days, and sick days do NOT count in calculation of overtime hours.
- 10.3. You are required to obtain specific advance approval from your supervisor before working overtime.

11. FAMILY & MEDICAL LEAVE (FML)

- 11.1. Family & Medical Leave grants an eligible employee up to a total of 12 workweeks of unpaid leave during a 12 month period for reasons defined below in Section 11.8.
- 11.2. To be eligible, you must have employed by Tribune for at least 12 months, and worked a minimum of 1,250 hours during the 12 month period immediately preceding the leave.
- 11.3. The year is defined as the 12 months following the first day of this leave, as opposed to any fiscal or calendar year.
- 11.4. If you are not eligible for FML, you may be eligible for Medical Leave. See that section.
- 11.5. Please give as much notice as possible of your intention to take FML. The law requires 15 days advanced notice in most situations.
- 11.6. In case of an emergency, a change of circumstances, or a situation that was unforeseeable, please try to give at least 2 business days' notice if you're planning to take FML.
- 11.7. FML may be used for:
 - 11.7.1. The birth of your child.

- 11.7.1.1. The right for this leave ends 12 months after the birth of your child.
- 11.7.2. The placement of a child with your family for adoption or foster care.
 - 11.7.2.1. The right for this leave ends 12 months after the placement of your child in your home.
- 11.7.3. The care of your spouse, or a parent or child with a serious medical condition.
- 11.7.4. A serious health condition that limits your ability to perform your job, defined as follows:
 - 11.7.4.1. Requires inpatient hospital, hospice or residential medical facility care.
 - 11.7.4.2. Requires continued care by a health care provider.
- 11.8. Use of vacation and sick leave in connection with FML
 - 11.8.1. You must begin unpaid leave by using any available (paid) sick and/or vacation time. You may generally elect to keep up to one week of vacation to use at another time during the same calendar year in which your FML expires.
 - 11.8.2. The sick or vacation time taken at the beginning of your FML will be counted as part of the 12 weeks of leave allowed under FML.
 - 11.8.3. You may be eligible for benefits under the Long Term Disability (LTD) or Short Term Disability (STD) plans while you're on FML.
 - 11.8.4. Approval of your supervisor is necessary to use vacation or sick time over and above the time discussed above.
- 11.9. Some states may have laws that require additional information or available leave time. Tribune abides by all state and local laws.

12. MEDICAL LEAVE

- 12.1. If you don't meet the requirements for FML, you may be eligible for simple Medical Leave.
 - 12.1.1. Medical leave can be granted at the discretion of your supervisor or manager.
 - 12.1.2. Once your sick days and vacation days are used up, medical leave is unpaid.
 - 12.1.3. Your job may not be available when you return and is not guaranteed. You won't get a job you're not qualified for when you come back.

- 12.1.4. If you participate in the Long Term Disability or Short Term Disability plans, you may be eligible for benefits under these plans while you're on Medical Leave.

13. MEDICAL COVERAGE CONTINUATION DURING A MEDICAL LEAVE OR FML

- 13.1. During FML, Tribune will continue your medical coverage as if you were working. You must make arrangements to pay any premiums before taking your FML, or, in the case of emergency leave, as soon as you can after the start of your leave.
- 13.2. If you decide not to return to work during your leave, you must reimburse the company for all premiums paid by Tribune during your leave.
- 13.2.1. Exceptions:
- 13.2.1.1. When failure to return to work is due to the continuation, recurrence or onset of a serious medical condition that would entitle you to FML or
 - 13.2.1.2. Other circumstances beyond your control.
- 13.2.2. Continuation of benefits:
- 13.2.2.1. You may continue to pay your portion of benefit premiums.
 - 13.2.2.2. If you don't pay your premiums, your benefits will stop.
 - 13.2.2.3. If your benefits stop due to non-payment of premiums, you must wait until the next annual enrollment period to re-enroll.

14. MEDICAL CERTIFICATION

- 14.1. Medical certification is required if you've asked for FML or medical leave because of your own serious medical condition or that of your loved one. Please make sure your doctor provides the certification as soon as possible, and within fifteen (15) days of your request for FML or medical leave.

15. MILITARY LEAVE

- 15.1. Tribune recognizes and supports the right of any employee to serve in the US Armed Services, the organized reserve unit of any branch of the US Armed services, or the National Guard of any state, and complies with applicable federal or state laws.
- 15.2. Please give as much notice to the company as possible if you are called to serve.

- 15.3. Tribune will continue your current pay for 90 days. After that, if the military pay is less than your current Tribune paycheck, Tribune will pay the difference.
- 15.4. When you come back from service, your employment will be restored in accordance with all state and federal laws.
- 15.5. Please do everything you can to stay safe while you are away.

16. JURY DUTY

- 16.1. If you receive a summons for jury duty, let your supervisor know immediately. This allows your team to prepare for your absence.
- 16.2. Bring a copy of the notification for your file so we know it's legit.
- 16.3. You'll be granted leave to fulfill jury duty obligations. Regular full-time employees will be paid for up to two weeks of jury duty at your normal pay rate, though this pay will not be considered in any calculation of overtime for a given pay period.
- 16.4. If your jury duty doesn't last for two weeks, please come back to work immediately.
- 16.5. When you return to work after jury duty, you do so with no loss of job status or seniority.
- 16.6. State law requirements may supersede or supplement these policies.

17. WORKERS' COMPENSATION LEAVE

- 17.1. State law dictates how Workers' Compensation is handled.
- 17.2. Please let your supervisor know immediately if you're hurt on the job.
- 17.3. If this injury is also considered to be a serious health condition under FMLA, Workers' Compensation Leave will be counted as, and run at the same time as FML.

18. E-MAIL, INTERNET, COMPUTERS & CONFIDENTIALITY

- 18.1. E-Mail and Internet Policy:
 - 18.1.1. Under normal circumstances, Tribune will not snoop in your e-mail or track your internet usage.
 - 18.1.2. Remember that cyber-slacking is not good judgment.
 - 18.1.3. Understanding that circumstances stray from normal from time to time, or due to circumstances outside the company's control, or if the

company suspects you're not using good judgment when using e-mail, internet or the computer, Tribune may have no choice but to snoop in your e-mail or your computer on occasion.

18.1.4. It's good judgment not to put in writing what you don't want printed on the front page of a newspaper. Or posted on a web site. Or heard on the news.

18.2. Confidentiality:

18.2.1. It is expected that your professional loyalty and allegiance will be to Tribune.

18.2.2. It is expected that you will not share anything of a proprietary nature with anyone outside the company.

18.2.3. See Rule #1 to determine what might be considered confidential, and remember that you seldom regret what you don't say.

18.3. Network:

18.3.1. The Tribune computer network is administered and maintained by people paid for that responsibility. Please do not upload unauthorized or personal software or data to the network without the approval or assistance of your network administrator.

19. BENEFITS

19.1. Benefits are outlined in separate publications for each benefit and are available from your business unit or on Triblink.

20. FINALLY ...

20.1. This handbook is not a contract. We may update, modify and interpret these policies. They'll change as we gain experience, usually to address issues that have already occurred. If you have any suggestions about how to make these guidelines more useful or productive, please write a note to any one of the people noted below.

21. WHO TO CALL

21.1. Contact List:

21.1.1. Corporate: Luis Lewin, Sr. Vice President, Human Resources:
(312) 222-4581, (llewin@tribune.com)

21.1.2. Publishing: Susan Mitchell, Vice President, Human Resources,
Publishing, (312) 222-5876, (smmitchell@tribune.com)

21.1.3. Broadcasting: Myrna Ramirez, Vice President, Human Resources,
Broadcasting (312) 222-4472, (mramirez@tribune.com)

21.2. Local Contact List: Contact your HR Office or Business Unit Head