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**THE
GLOBE
AND
MAIL** 

**EDITORIAL
CODE OF CONDUCT**

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Globe and Mail Editorial Code of Conduct

Globe and Mail Editorial Code of Conduct Updated 2017

This Editorial Code of Conduct is designed as a road map to clarify the boundaries between ethical and unethical journalism. The Globe and Mail sets a high bar for its editorial staff and regular freelancers. They must not only conduct themselves honourably, but be seen to do so by the public. The guidelines included in the Code apply to all platforms. While all journalists and editorial managers are responsible, it is ultimately the editor-in-chief or his or her delegate who rules on the guidelines.

The Globe and Mail's long-standing tradition of journalistic integrity and credibility is essential to its reputation as Canada's most trusted news source. This reputation is rooted in the conduct of the editorial staff. Unless all employees strive for the highest standards of journalistic integrity, we cannot hope to sustain the trust we have inspired in our readers for generations.

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Journalistic principles

The credibility of the content in The Globe and Mail on all platforms rests on solid research, clear, intelligent writing and maintaining a reputation for honesty, accuracy, objectivity and balance. To these ends, the following rules and principles apply:

- The Globe and Mail will seek to provide reasonable accounts of competing views in any controversy so as to enable readers to make up their own minds.
- It is unacceptable to invent or falsify a quote, source, anecdote, detail or anything else pertaining to the news.
- News pictures must be real images captured by a camera, not created or altered. The rule is relaxed for feature illustrations, magazine illustrations and photographs, but careful judgment is required and notice should be given to readers
- In dealing with people who are emotionally vulnerable and unaccustomed to talking to reporters, The Globe and Mail will take care to respect their dignity and feelings.
- In the usual circumstances of the job, Globe and Mail reporters will identify themselves and make it clear they are working on stories. There are times when it is best to remain unidentified, however. Reporters should advise their editors in advance where possible if they do not plan to identify themselves and after the fact if not. Reporters must consult their editors if there is doubt about the legitimacy of any proposed news-gathering tactic.

Journalistic practices

These practices apply to all sections of the newspaper and all digital platforms, to staff reporters and freelancers.

- Quotation marks are the warranty that what is printed between them is what was said. Exceptions to this rule are few and relate chiefly to the difference between written and spoken language.
- Writers may sometimes fix lapses in grammar or pronunciation of the ordinary sort that go unnoticed in conversation, but the changes must be minimal and carry no risk of altered meaning.
- Hesitations, repetitions and false starts may be overlooked. This does not mean that quotes may be tightened or smoothed or otherwise recast for the writer's convenience or any other reason.
- Ellipses are to be used within quotations to indicate that words have been removed. *See also the entry on quotations in the Style Book.*

► ATTRIBUTION

- It is unacceptable to represent another person's work as your own. Excerpts from other people's prose must be attributed so as to avoid even a suspicion of copying. Although it is sometimes reasonable to adopt a few words without attribution (in a technical definition, for example), careful judgment is required. When in doubt, consult a senior editor.
- Any extensive unacknowledged use of another's words, structure or ideas may constitute plagiarism. Exception: Background and technical information from previously published Globe staff and news-service items may be recycled, verbatim or otherwise, without credit, although you should not borrow someone's distinctive prose style in doing so.
- Information from another publication must be checked or credited before it is used. This does not apply to material supplied by news services to which proper credit is given. When in doubt about information from any source, always double-check.
- Although verified facts need no attribution, The Globe and Mail identifies sources of less-than-obviously-factual information in most circumstances.
- In cases of leaked documents, we have an obligation to make every reasonable effort to confirm the veracity of the document.

► ANONYMOUS SOURCES

In an ideal world, there would be no anonymous sources, but sometimes an important story cannot be obtained without protecting a source who risks retribution if identified. Reporters should strive to minimize the use of unattributed quotes, keeping in mind that the justification for omitting attribution is to get the fullest story possible, not to let people dodge accountability or take anonymous potshots.

Anonymity is granted not by an individual reporter, but by The Globe and Mail through the editor-in-chief or senior editorial managers. If granted, we must make clear to sources that anonymity may, on rare occasions, be compromised beyond our control due to external factors.

Quotes with names attached carry more weight, lend credibility to The Globe and Mail and increase public trust in the product. Direct quotes should not be attributed to anonymous sources but should be paraphrased and cannot include personal attacks. In rare circumstances a direct anonymous quote can be allowed with the approval of a senior editorial manager. Excessive use of anonymous quotes raises doubts in the public's mind about our overall accuracy and credibility.

In routine matters, sources must be prepared to speak on the record, and should be pressed again if they refuse. When such efforts fail, reporters must decide whether to proceed with the interview. If they do, they must try, as much as circumstances permit, to reach a mutual understanding of such terms as "off the record," "background" and "not for attribution," and keep track of which elements of each conversation are subject to restrictions.

Reporters should be persistent in pressing sources to put information and quotes on the record. Editors must press reporters to get that information on the record.

The use of anonymous sources should be the last resort and subject to the following conditions:

- They convey important details or information that cannot be obtained for attribution elsewhere;
- They are not used to voice opinions or make ad hominem or personal attacks;
- We must be diligent in describing sources as fully as possible. That includes: how the anonymous sources know what they know, why they are willing to provide the information, why we agreed to grant them anonymity and how they will be described in an article.
- A senior editorial manager must be told the name and full details before an anonymous source can be used.

► BALANCE AND DISCUSSIONS WITH SOURCES

In the interests of transparency and trust, reporters have a responsibility to extend a right of reply to the key subjects of their stories on the central aspects of the piece prior to publication. If those key subjects cannot be reached in a reasonable time, the article must explain what efforts were made to reach them.

On occasion, it may be permissible to ask one or more experts to review a draft. This applies primarily to complex scientific, medical, legal and financial matters. It

does not mean The Globe and Mail will accede to any request from the subject of a story to read it in advance. Reporters may occasionally read quotes and other directly attributed material to the source for comment. This courtesy confers no right to dictate changes.

The Globe and Mail recognizes that there are frequent and essential negotiations between journalists and their sources to track down information and obtain on-the-record quotations. There must, however, be clear boundaries to these discussions to ensure that sources are not dictating our journalistic content.

The Globe and Mail does not allow its journalists to send written copies of their stories or quotations to sources for approval or tweaking of content.

Care should be taken in telling outsiders when an article might run, especially when the knowledge might be of financial, commercial or political advantage. (This does not apply to editorial custom content reports for which schedules are published.)

No one may pass on information about confidential news plans or colleagues' works in progress to anyone outside the newspaper.

► EMBARGOES

Embargoes can be useful (giving writers extra time to digest complex reports, for example) or manipulative. The Globe and Mail will be bound only by restrictions to which it has agreed and may choose to ignore release dates on unsolicited material. We will honour embargoes accepted by our news-service providers under the same guidelines as our own. As with anonymous sources, it is The Globe and Mail which decides whether to accept embargoed material.

There may be occasions when material received under embargo is also obtained independently by the organization. Whether this justifies breaking the embargo is a decision for a senior editorial manager. If an embargo is broken elsewhere, all deals are off. And if a decision is then made to publish, that should be communicated, where possible, to the agency which imposed the embargo. ■

Corrections and our readers

Corrections: The integrity of The Globe and Mail — and the trust our readers place in us — is strengthened by a strong, clear and straightforward approach to how we acknowledge and correct mistakes. We strive for a culture of accuracy, and expect any staff member who finds an error in our published work to report it to a senior editor.

All significant factual errors should be corrected in stories, graphics, headlines, captions, photographs and other elements that appear in our newspaper, magazines and all platforms. The aim is for consistency and transparency across the company through a process that lets us publish corrections as quickly as possible.

Venue: Corrections for all items are published on page A2. Corrections also run in our magazines.

Wording: We should use clear, careful but unambiguous language. All corrections must be vetted by the public editor. We should, where possible, acknowledge what the error was and correct it with the facts.

Columnists: Errors in columnists' work are corrected on A2. In addition to an A2 correction, columnists may also wish to comment on mistakes in their next column.

Assessing responsibility: Corrections may be attributed to editing errors when an editor has added something incorrect to a story.

Web/digital: We have two policies for correcting work on the Web. Stories that are posted throughout the day will be corrected immediately after an error has been found. Stories that are part of the newspaper archive or stories that have been published on the Web for a significant period of time will have a correction appended as soon as the correction is approved.

We should not wait until the correction appears in the newspaper before ensuring that all versions posted on digital platforms are updated.

Process: Reporters or editors who find errors in the newspaper or on the Web should report them to the pertinent manager. All managers should report these errors to their masthead editor for vetting, with a copy to the public editor.

All reader queries about the accuracy of a reporter's or editor's work should be directed to a senior editor in the relevant department, who will discuss the issue with the reporter and/or editor involved.

Public editor: This position serves as a link between readers and the newspaper, websites and other content. The public editor responds to readers' comments and complaints as a knowledgeable source and an advocate for the reader, and also weighs in on issues of The Globe and Mail's journalistic credibility.

The public editor deals with corrections, works out the wording and arranges for their publication. This position monitors the number and type of errors that are published and serves as an early-warning system for journalistic errors.

► UNPUBLISHING

The Globe and Mail generally does not "unpublish" content or remove details such as names from our websites and archives other than for legal reasons, but it does correct and update articles as necessary if there is a significant factual error. Inquiries for a possible exception to this rule must be made in writing to publiceditor@globeandmail.com. A committee of editors and lawyers will review the request and there will be a response. Any decision to remove any content will be made by the editor-in-chief. ■

Paying our way

Gifts, tickets, junkets, discounts, free items and lunches: The guiding principle is that editorial staff members may accept no benefit of more than nominal value (i.e., estimated retail value \$25) offered to them because they work for The Globe and Mail. Corporate discounts offered to other corporations are acceptable if offered through The Globe and Mail for the company as a whole.

Product samples may be kept for reference, passed on to colleagues for whom they may be of professional use or donated to a charity sale. Staffers may not sell them. Those who keep such items for personal enjoyment must make a similar-value charitable donation. Other free items of more than nominal value must be returned or given to charity. If in doubt, consult a senior editor.

Staffers must not use their connection with The Globe and Mail to solicit or obtain free or discounted goods or services, or any other financial advantage not available to the general public. In no case may they use the name, letterhead, e-mail or Web address of The Globe and Mail, or any social-media accounts which identify them as Globe and Mail journalists, to advance their personal interests.

Free admission to sports and entertainment events or access to professional services may be accepted for review purposes. Although it is seldom important who pays for lunch in business entertaining, The Globe and Mail pays whenever possible. Staffers may accept invitations to sport and entertainment events only for work-related purposes, such as the chance to talk to people of journalistic interest. Staffers may accept complimentary intra-city transportation to such events. At receptions, parties and so on, staffers may accept customary hospitality, meaning food and drink consumed on the spot.

Accepting press or media rates for travel and for industry events is acceptable for certain non-news-related features, with the approval of an editorial manager. The manager will consider the following factors: Is travel required to complete the assignment; what is the scope of the article; who is footing the bill (a single commercial venture would generally not be acceptable); and does the journalist bring unique expertise to the subject matter that warrants the assignment.

If a journalist would like a friend or relative to accompany them on the trip, it must be approved by a senior editorial manager and any additional expense must be paid by the staffer.

Assigning editors must confirm with freelancers whether they have accepted or are planning to accept media rates for travel or other free or discounted goods and services and if so ensure that the proper disclosure is made. Any product should be reviewed under the same guidelines, including the length of time the loan of the product is necessary for the review.

In the interests of transparency, any story written by staff members or freelancers that is based on free or discounted travel arrangements or product review must include a disclosure to the reader that accompanies the article as to the discounted or free services.

Outside work and activities

Editorial staff are encouraged to engage in outside activities where to do so enhances their reputation and, by extension, the reputation of The Globe and Mail. However, all staff must keep in mind that, as employees of The Globe and Mail, what they say and do outside of their work may impact the reputation of The Globe and Mail. The Globe and Mail takes its reputation seriously and any conduct outside the workplace that could negatively affect this reputation would be a violation of this policy.

Radio and television work: Understanding the pressures of time and location, staff must consult with a senior editorial manager before accepting a broadcast appearance. Their manager has the right to refuse.

Writers and editors routinely involved in coverage affecting a broadcaster may take no payment from the broadcaster.

Columnists with wide-ranging mandates are not automatically barred from paid on-air work merely because they write about broadcasting from time to time, but careful judgment is required. A columnist making frequent appearances may face a choice of refusing payment or not writing about matters affecting the broadcaster. When it is relevant, columnists may be required to disclose in their columns that they have received payment from specific organizations.

Staffers must keep in mind that their first duty is to The Globe and Mail and its readers (see the section on freelance writing and editing). They must also be careful not to taint their Globe and Mail coverage by drawing conclusions or taking sides in ways that are incompatible with journalistic practice as set out in this Code.

Speeches, seminars and other appearances: Editorial staffers must seek approval from their senior editorial manager if they are invited to make paid speeches and other paid appearances. These conditions will apply:

- Any staff member wishing to accept payment for a speech or other appearance must seek prior approval by his or her masthead editor, leaving time to cancel if it is deemed inappropriate. Such speeches or appearances are not allowed if it would create a real or apparent conflict of interest involving commercial interests, or political or advocacy groups.

- The staffer must specify the payment and any expense reimbursement he or she would receive. Honorariums and gifts of anything more than nominal value are payments (i.e., estimated retail value \$25).
- Permission will generally be denied to any writer or editor routinely involved in coverage affecting the organization offering the payment.
- Other than for educational institutions, appearances or speeches should be accessible to the public. Exceptions must be cleared in advance by a masthead editor. Generally, approval will be given if the appearance is critical to doing your job.
- Columnists with wide-ranging mandates are not automatically barred from accepting paid engagements from every organization about which they may have occasion to write, but careful judgment is required. When it is relevant, columnists may be required to disclose in their columns that they have received payment from specific organizations.
- Speeches or appearances by those promoting their books are allowed, but a senior editorial manager should be informed and this work should be done on the employee's time.
- These rules do not generally apply to unpaid appearances, but staffers must seek approval from their superiors of plans to appear before groups they are routinely involved in covering. When unpaid appearances require out-of-town travel, staffers may accept reimbursement of reasonable expenses: airfare, meals and hotel accommodation, for example, but not an extended stay at a resort.

Freelance writing and editing: All rules applicable to paid speeches apply equally to paid work for publications, published by or for groups or corporations that may be subjects of coverage. Examples include association journals, in-flight magazines, game programs, annual reports and promotional inserts. Staffers generally are barred from taking any sort of payment from an entity they are involved in covering.

The right to engage in freelance work for publications that compete with The Globe and Mail is subject to management policy and union contract. Staffers' first duty is to their news organization and its readers. Thus, for example, they may not withhold or suppress material in their Globe and Mail coverage for use in freelance articles or books. Nor may they scoop The Globe and Mail without first offering the story to the organization. These points also apply to broadcast work. ■

Social media and online activity

Social media offer useful tools for both gathering information and connecting readers with Globe and Mail reporting in a timely, convenient manner. Effective use of social media may also help build the profile of The Globe and Mail and the journalist. While using social media, staff must apply the standards and principles set out in the Code.

All Globe and Mail staff members are personally responsible for the information they publish on Twitter, Facebook and other social-media platforms, including personal blogs. Journalistic accuracy, fairness and clarity should be the guiding principles of editorial staff in any public forum, online or otherwise. Do not post partisan, defamatory or clearly false material. You must not post personal attacks and should conduct yourself in a professional and respectful manner. Staff should be aware that passing along information, through links or otherwise, could be seen as approval or endorsement of that information by The Globe and Mail. Care should be taken.

Hate speech and personal attacks hurt the reputation of our staff and the organization, and are unacceptable. Profanity should be avoided.

While columnists may express their opinions publicly on a topic, staff should be aware that anything published via social media — even private postings — can become public and associated with The Globe and Mail. Editorial staff should be aware of the risks of libel, malice and bias and should remain temperate on public and political issues. This means content that would not be considered for publication should not be posted.

Community, charitable and advocacy groups, public institutions, for-profit companies: Staff members should seek prior approval before joining any such group. Their outside interests will not be restricted without reason, but certain rules apply. They must not use their position to further the interest of that outside organization or put themselves in a real or perceived conflict of interest.

Boards of directors and comparable decision-making bodies: These are off-limits to writers and editors routinely involved in coverage affecting the organization in question, and to everyone listed on the masthead. For example, the editor-in-chief cannot sit on a hospital board, nor can a health-policy reporter or an editor who assigns health stories. Even where no clear conflict exists, staffers must seek prior approval from a senior editorial manager before accepting board appointments.

- Being a director implies keeping secrets. Thus, a Globe and Mail staffer serving on a board may know things he or she cannot report. At a minimum, the staffer must take no

part in coverage of such matters, and do nothing to influence the coverage, declaring a conflict if necessary. In some cases it may be advisable not to take part in board discussions of touchy items.

- It is hard to imagine a case in which a Globe and Mail staffer could appropriately serve as the chairman, spokesman or primary public face of an outside board.

- Staffers should be prepared to resign from boards when serious conflicts arise. Those involved in private ventures in any capacity must be particularly careful to do nothing to influence coverage of their business or stock-market prospects or those of their competitors.

- It may be acceptable for columnists to sit on boards of charitable or community organizations provided they make appropriate disclosure in all columns touching the interests of the organizations.

- Staffers who find themselves in violation of these rules may complete board terms to which they were committed before the rules took effect. The rules do not apply to media associations, journalism groups or labour bodies representing Globe and Mail employees.

Fundraising: Writers and editors must keep their distance from organizations they take part in covering, which rules out raising money for them. Otherwise, staffers are free to help their chosen causes by any means, from tag days to telephone campaigns, provided they do so as private citizens without identifying themselves as Globe and Mail employees. The connection must not be exploited even implicitly; for example, writers and editors must not solicit donations from anyone who might recognize them as such and hope to gain The Globe and Mail's favour.

These rules do not apply to charitable campaigns conducted within The Globe and Mail itself.

Lobbying: Again, The Globe and Mail connection must not be exploited. Staffers generally are free to make submissions to government agencies (for example, school boards and municipal committees) on their own behalf or for groups of fellow parents, residents or whatever, assuming they do not routinely take part in coverage of the agency or subject matter involved. On the other hand, it is almost certainly inappropriate for anyone recognizable as a Globe and Mail employee to lobby the provincial or federal government on behalf of a group likely to be a subject of coverage.

In all cases, careful judgment is called for. Staffers who are thinking of taking part in lobbying efforts should consult their senior editorial manager. These rules do not apply to media associations, journalism groups or labour bodies representing Globe and Mail employees.

- Membership and financial contributions: As private citizens, Globe and Mail staffers may give money to causes. However, this does not include any political or partisan contribution without the explicit approval of a senior editorial manager. Staffers should be aware that any donation can become public. They may also be dues-paying, rank-and-file members of just about any organization they choose, assuming they do not routinely take part in related coverage. They should consult their senior editorial manager for approval before taking more prominent positions in groups likely to be in the news.

Staffers must not permit their association with the company to be exploited by any outside group.

Award juries and advisory committees: Staff members may sit on award juries and advisory committees that serve worthwhile public causes (including academic awards) or journalistic purposes and do not blatantly promote commercial or institutional interests.

Any invitation to act as a juror for other purposes must be approved in advance by a senior editorial manager. Other than mentioned above, generally this will be denied for anyone other than a critic. Such staff members may accept reimbursement of reasonable expenses if travel is required.

In considering invitations to join such bodies, staffers should be aware of practical problems that may arise and the danger of being co-opted or appearing to be co-opted by the sponsoring group.

Writers and editors should not be involved in coverage of awards for which they serve as judges. They must consult their senior editorial manager on whether this restriction would complicate assignments unreasonably. Nor can staffers agree to keep secret things they learn while serving on juries or advisory committees, except to the extent of not leaking award decisions before they are announced. In the interests of free discussion, they may agree not to attribute statements to other participants without their permission.

Staffers who serve on juries should avoid taking prominent roles in promoting or presenting the awards and in most circumstances should not serve as chair. They are not barred from taking part in coverage of the awards in subsequent years, however.

Those who serve on advisory committees must keep in mind the distinction between helping groups understand what makes news and coaching them on manipulation of the press. They must avoid the latter.

Political activity: The news operations of The Globe and Mail must be, and must be seen to be, impartial. This goal must be balanced against the fact that staff members have rights and responsibilities as citizens.

While private views expressed through voting or with family and close friends are acceptable, political or partisan views which go beyond your public-facing role should not be expressed in public. Staffers should be aware that even in private settings on social media, information can become public.

Involvement in a political campaign at any level will not be approved. Such things as political contributions, party membership, taking part in protest or political marches, demonstrations, online petitions, lapel buttons, lawn signs (see below) and campaign work are out. Any exception to this rule should be pre-approved by a senior editorial manager.

The question is whether the proposed activity would tend to promote doubt about The Globe and Mail's impartiality in terms both of issues and politics.

Nothing in this policy affects the right of those with whom they share dwellings, including their spouses, children and tenants, to display lawn signs or otherwise exercise their political rights.

Personal interests: As a general rule, reporters and columnists should avoid taking part in coverage of matters in which they have or may be perceived to have significant personal interests. Editors should do nothing to influence the selection, wording, approach or play of stories in which they have or may be perceived to have such interests.

In this context, personal interest means a financial stake in a matter being covered, an outside involvement with a group or association being covered, a close friendship, romantic attachment or near-family relationship to someone whose career or other interests may be affected, or any other entanglement that could lead to less than even-handed treatment.

The Globe and Mail relies on staffers' integrity and common sense in the application of this rule. In some cases, the necessities of daily production may make strict adherence impractical. Some personal interests may be too general or trivial to count. For example, it might be hard to cover a teachers' strike if everyone related to a teacher were disqualified. On the other hand, close relatives of bargainers on either side could not take part in the coverage.

Similarly, it may be a bad idea for a writer whose spouse is an official of a company, association or government department to cover that body, or for an editor in the same position to direct the coverage, to cite just one possible source of conflict. In columns and feature stories, significant personal interests may be noted either in the text or in italics at the end. This gives the reader an even break and generally takes care of the problem. The news format does not lend itself to such disclosure, however.

At a minimum, writers must inform their editors and seek guidance when they have significant personal interests in matters they may have occasion to write about. When editors face comparable situations, they must inform their superiors and seek guidance. When they cannot avoid taking part in the assigning or handling of stories in which they have interests, they must notify the writers of the situation and take extra care not to let their views intrude.

Investments (see more details in the Report on Business policy on staff investment): Everyone must honour the general principle of the Report on Business policy on staff investing.

No one should benefit personally from knowledge obtained as a Globe and Mail employee until that knowledge is in the public domain. In general, journalists should not write about securities they own. And they are strictly forbidden from trading on information they know is going to appear on any platforms. The policy further sets out specific rules for ROB staffers, masthead editors and select others named by a member of masthead who are required to disclose their investments annually to an independent adviser. In all departments, employees with doubts about investment situations should seek guidance from their superiors. ROB staffers may also consult the independent adviser. ■

Book, film, television and recording policy

There is a long and illustrious tradition of Globe and Mail journalists writing books, radio and television documentaries, films, plays and other creative treatments. The Globe and Mail supports its journalists in such endeavours, but also expects that its employees' first loyalty will be to The Globe and Mail. This policy is intended to formalize existing practices and to clarify how The Globe and Mail supports such activities while protecting its copyright and its business interests. It is consistent with both The Globe and Mail Editorial Code and the editorial collective agreement, which reinforces The Globe and Mail's copyright for works created in the course of employment and which allows The Globe and Mail to restrict outside activity that is directly competitive with, or exploitative of, the employment relationship.

Ownership of copyright: The Globe and Mail owns the copyright for all works created by staff members for The Globe and Mail and its products. "Works" includes published and unpublished content, photographs, illustrations, recordings, drafts, notes, interview transcripts and other products created in the course of employment.

Staff members may not reproduce, publish or republish works owned by The Globe and Mail, or publish material substantially derived from works owned by The Globe and Mail, without the prior written permission of The Globe and Mail. This covers all content, although links to globeandmail.com articles are acceptable.

Staff members must notify the editor-in-chief or his delegate and obtain the written permission of The Globe and Mail before entering a contract with another organization that may require the reproduction, publication or republication of any works owned by The Globe and Mail or that may require publication of material substantially derived from works owned by The Globe and Mail.

Staff members must promptly forward to their senior editorial manager all inquiries by organizations seeking rights to works owned by The Globe and Mail.

Copyright protection: Staff members must take reasonable precautions to safeguard unpublished works owned by The Globe and Mail (for example, notes, interview transcripts and other working materials) from unauthorized reproduction or republication by other organizations. Staff members may not share unpublished works owned by The Globe and Mail with another organization without the written approval of The Globe and Mail.

Freelance writing and consulting: The editor-in-chief or his or her delegate will not approve any proposals to reproduce, publish or republish any works owned by The Globe and Mail, or substantially derived from works owned by The Globe and Mail, by a direct competitor of The Globe and Mail — that is, any company that publishes news or other information in print and/or electronically.

The Globe and Mail may permit staff members to undertake freelance writing and consulting work for non-competitors as outlined in The Globe and Mail Editorial Code, “Freelance writing and editing.”

Staff members who embark on outside writing projects or other outside projects must not promote or appear to promote such projects when they write for The Globe and Mail in the course of employment.

Radio and television appearances: Staff members who make appearances on radio and television shows must conduct themselves in a manner that reflects their role as public representatives of The Globe and Mail.

Staff members must receive the permission of the editor-in-chief or his or her delegate before accepting contracts for regular appearances on radio or television. ■

Awards and prizes

The Globe and Mail is proud of its journalists and is happy to see them receive recognition for their work, so long as the honour does not undermine the integrity of our organization. We have a long history of winning awards sponsored by professional journalism associations such as the National Newspaper Awards and the Michener Awards Foundation. These are only two of the many prizes that are available to journalists.

Our policy is designed to help staff members navigate around questionable awards. Generally, our policy seeks an arm’s-length relationship between sponsors and the awards they support, a record of appointing independent judges and a willingness to honour critical reporting. Staff members who win unsought awards from groups that do not meet these criteria should decline the honour and explain our policy.

Staff members may not enter local, national or international competitions sponsored by commercial groups that have a direct interest in the tenor of our coverage. As well, staffers may not act as judges for these competitions or accept their awards. Common examples are contests sponsored by commercial or political associations to judge coverage of their own affairs. Exceptions may be made for advocacy groups if the competition is broad in scope, judged independently by disinterested experts and/or public figures and has a track record of recognizing journalistic excellence.

Generally, staff members are free to accept honorary degrees, medals and awards from colleges, universities and other educational institutions, as well as provincial and federal honours for their contribution to society, such as the Order of Canada. However, those who cover higher education or politics, or who supervise that coverage, should be sensitive to any appearance of bias or favouritism. If in doubt, please consult a senior editorial manager before accepting any such award. ■

Photo policy

This covers all photographs and video content. Any exceptions to these photo guidelines must be approved by a senior editorial manager. Globe and Mail photographers are journalists who use cameras to report on events and stories in the news. Their job is to inform and engage with readers honestly, accurately and in a clear and compelling manner. Any attempt to mislead or misinform is prohibited. Any questions about photo policy should be directed to the photo editor or one of the assistant photo editors.

► PHOTO GUIDELINES

- News images are documentary images. They should not be manipulated, combined or distorted either in a camera or on a computer.
- News photographs should not be staged and should not be re-enacted from incidents or events.
- Subjects in portrait, studio and fashion shoots may be directed and posed by photographers.

All images that appear in the newspaper or on the Web go through three distinct processes: photography, editing and editorial oversight.

► PHOTOGRAPHY

Journalists and assigning editors must:

- Avoid stereotyping by race, gender, age, religion, ethnicity, geography, sexual orientation, disability, physical appearance or social status.
- Make efforts to gain the permission of a parent or guardian, where possible, before identifying children under the age of 16.
- Be sensitive when seeking or using images of those affected by tragedy or grief.
- Be judicious about identifying criminal suspects before the formal filing of charges. If in doubt, consult a senior editorial manager.
- Be mindful that privacy laws vary across the country and are especially stringent in Quebec.

▶ PHOTO EDITING

■ Documentary images must not be digitally altered beyond minor adjustments for colour correction, exposure correction and removal of dust spots or scratches in an effort to ensure a clear and faithful reproduction of the original image. Exaggerated use of burning, dodging or colour saturation is prohibited.

■ Illustrative and conceptual photography must be labelled “photo illustration.”

■ Photo illustrations that have been altered using Photoshop or other editing software must not look like real pictures to the reader or viewer. Before creating a photo illustration, photographers, photo editors and designers must obtain approval from the photo editor or deputy photo editor.

■ Photo editors must verify the authenticity of handout photos. Except in rare instances, credit lines must identify the source of such photographs.

Video: Editors must be cautious when linking to outside videos, especially in crime stories where the juxtaposition of a video with a story or reader comments could bias a case against a defendant. In all cases, videos — Globe-produced, wire services or outside videos available on the Web — should be held to Globe and Mail standards of taste, balance and legality.

Photo: Editors should avoid using Globe and Mail photographs taken for specific stories as stock photos for unrelated stories. Editors should avoid the use of images taken from the Web generally, and social-media platforms, without permission of the copyright holders. Exceptions should only be done in consultation with a senior editorial manager. ■

Editorial oversight at the senior editorial or masthead level

■ It is illegal to publish a photograph that will identify a suspect, victim or person who appeared as a witness to a crime under the age of 18, if the incident reported on involves a young person dealt with under the Youth Criminal Justice Act. If in doubt, consult a senior editorial manager.

■ Showing dead bodies, bloodied victims and traumatized survivors of bombings, massacres and other tragedies is justified, provided the image is historically relevant and/or advances the story in a serious and considered manner; conveys information relevant to the story; and is not intended primarily to shock readers or viewers.

Report on Business policy on staff investment

The purpose of this policy is to protect the reputation, credibility and integrity of The Globe and Mail by preventing real or perceived conflicts of interest among our staff.

We also want to protect staff and regular freelancers who write about investments or public companies from possible charges of bias or conflict of interest. The best way to do this is to have a policy on investment by staff that is clear and public.

The general principle: No one should benefit personally from knowledge obtained as a Globe and Mail journalist until that knowledge is in the public domain. In situations of doubt, you are asked to discuss the issue with your editor or with the independent adviser.

In general, staff members and others should not write or handle content about companies whose securities they own. And they should not trade on information they know is going to appear on any Globe and Mail platform or product.

This policy has been devised with input from staff members. It applies to all Report on Business staff, editorial directors, and all other staff who are aware of information that might affect a stock price or valuation.

In addition to our written policy, we have a system of investment disclosure to a third party. We require those referenced above (ROB staffers, masthead editors and select others named by a masthead editor) to participate in the disclosure process.

How it works: You will be required to be familiar with our policy on the personal investments you should and should not be making. A breach of the policy may result in a disciplinary response. You must make an annual disclosure of your investments to our independent adviser, and update him or her when you make changes.

This information is confidential. It is not shared with ROB editors. The only exception is when our independent adviser perceives an instance of conflict or bias in the paper (e.g., in the most obvious case, a columnist hyping a stock he or she has just purchased).

If the adviser spots a problem, he or she will contact both the staff member and the ROB editor. It is up to the ROB editor to decide whether the policy has been breached and what measures to take.

► **HOW IT WILL BE COMMUNICATED:**

Staff members will get a copy of the policy once a year and sign that they have read it. New staff will be asked to review the policy with their editors.

What about grey areas? If you're uncertain about whether you have an investing (or any other) conflict, talk to your senior editorial manager. We recognize that not every circumstance can be covered in this policy. You can also call the independent adviser for an opinion on a confidential basis.

► **SPECIFICS:**

1 ROB reporters are not permitted to make personal investments in companies they are likely to write about as part of their usual assignments. For example, an ROB reporter who writes regularly about the beer industry should not own beer company shares. In the case of a beat change, a reasonable period (normally three months) will be given to divest holdings.

2 If an ROB reporter owning stock in a company outside his or her regular beat is assigned a story concerning that company, he or she should discuss the matter with a senior editorial manager before undertaking the assignment. The editor may decide that another reporter should do the story. This can apply to programming and editing staff. Anyone owning company securities who might be in a conflict should discuss it with their senior editorial manager.

3 Staff members are not permitted to engage in speculative short-selling of stocks. However, short-selling — or using derivatives such as options or warrants — is allowed for hedging purposes (that is, to protect an existing investment or portfolio). In no circumstances can a beat reporter engage in short-selling on any security on their beat, even in the case of hedging.

4 Staff members are not permitted to buy shares in an initial public offering or a marketed secondary offering or a private placement. They must wait until the shares begin trading on the secondary market. Abuses can arise when shares are limited and doled out to favoured investors.

5 Staff members who write investment columns and also hold securities mentioned in the column will state their ownership clearly. The disclosure format will be determined between the columnist and a senior editorial manager. Freelance investment columnists who hold securities — or who work for firms that hold positions in securities — will also abide by this disclosure rule.

6 Generally exempt are investments in broadly diversified mutual funds, and exchange-traded funds, money-market funds, treasury bills and government debt securities of all kinds, as well as investment accounts in which all trading decisions are made by an independent money manager. Beat reporters, however, should not invest in specialty equity funds or specialty ETFs or any other securities that offer a play on companies on their beat, such as precious metals, energy or real-estate funds.

7 A reporter or columnist writing about a mutual fund that he or she owns, as well as a mutual-fund company or any investment management firm where he or she has invested money, should discuss the matter with a senior editorial manager before undertaking the assignment.

8 Staff members who have advance knowledge of specific investment news should not make a securities transaction related to that news until it has been published for a full market day. Similarly, staff members should not buy or sell any securities or otherwise make investments in anticipation of forthcoming articles in The Globe and Mail.

9 Staff members should not alert people outside the Globe and Mail newsroom, including family and friends, to any investment-related information they have learned before it is published.

10 There is no intention of interfering with independent decision-making by members of employees' families. However, any attempt to evade these guidelines by trading or holding securities in the names of family members or others will be treated as a breach of these guidelines.

11 All freelancers for Report on Business will be advised annually of our conflict guidelines and sign that they have read them, and will be requested to advise their editorial manager of any potential conflicts that may arise from a story assignment. ■

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