# **TEGNA**

# Whistleblower Protection & Ethics Violations Reporting Policy

Every TEGNA employee is responsible for ensuring that the Company's actions and associations maintain the highest ethical standards. These standards guarantee the independence and integrity of our news, editorial, information, advertising, and marketing services, and ensure TEGNA fully complies with all pertinent laws and regulations. As an employee, you are obliged to report any suspected violation of Company policy (including any violation of accounting, ethics, or auditing policy), unethical practice, or any suspected violation of the laws governing the Company's business, including antitrust laws and regulations.

#### Reporting Responsibility

This policy is intended to encourage and enable employees and others to raise concerns internally so that TEGNA can timely assess, address and, if necessary, correct inappropriate conduct.

# No Retaliation & Confidentiality

TEGNA employees will not be disciplined or suffer retribution for reporting violations or suspected violations honestly and in good faith. There is no need to identify yourself, if you prefer not to. All reports will be kept confidential except as necessary to conduct an investigation.

# Reporting Procedure

Reports of suspected ethics or legal violations can be made through the following methods:

- Via the ethics hotline: 800-695-1704
- Via email: tegnaethicscomplaints@tegna.com
- Via mail: Law Offices of Garrett S. Flynn, LLC, 10 North Main Street, Suite 221, West Hartford, CT 06107
- TEGNA's Chief Ethics Officer, Chris Moeser (at 703-873-6964 or <u>cmoeser@tegna.com</u> or mail at 8350 Broad Street, Suite 2000, Tysons, VA 22102)
- TEGNA's General Counsel and Antitrust Compliance Officer, Marc Sher (at 703-873-6878, via email at <a href="mailto:msher@tegna.com">msher@tegna.com</a>, or mail at 8350 Broad Street, Suite 2000, Tysons, VA 22102)

# **Consent Decree**

In December 2019, a federal court in Washington, DC entered a Judgment resolving allegations by the U.S. Department of Justice that TEGNA and certain other broadcast television station groups improperly shared non-public, competitively sensitive information directly and through national advertising representative firms. This Judgment is available <a href="here">here</a> and an explanation of the Judgment is available <a href="here">here</a>. Any suspected violations or potential violations of the Judgment should be reported immediately through one of the methods listed above.

# LINKS:

**Ethics Policy** 

Principles of Ethical Journalism

Inside Trading and Anti-Hedging Policy

Antitrust Judgment and Explanation of Judgment

Corporate Governance Home Page