

TEGNA

Harassment

We commit to our employees that the work environment will be free from all forms of discrimination. This includes harassment on the basis of race, color, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, gender identity, family responsibilities, disability, enrollment in college or vocational school, political affiliation, veteran status or genetic information.

Conduct, in the workplace, at work-related activities, and when socializing with coworkers, clients and customers outside the workplace, whether intentional or unintentional, that results in harassment, will not be condoned.

Employees who feel they have been subjected to sexual harassment, or harassment on any other basis, should immediately report the incident directly to their supervisor, department head or a human resources representative. An option for anonymous reporting is also available by using the TEGNA Hotline: 800-695-1704.

Sexual Harassment

Sexual harassment is prohibited here. Unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature constitute sexual harassment when: (1) submission to such conduct is made, either explicitly or implicitly, a term or condition of employment; (2) submission to or rejection of such conduct is used as a basis for employment decisions; or (3) such conduct has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

No employee shall threaten or suggest, either directly or indirectly, that another employee's refusal to submit to sexual advances will adversely affect the employee's continued employment, evaluation, compensation, assignment, advancement, or any other aspect of employment. Similarly, no employee shall promise or suggest, either directly or indirectly, that another employee's submission to sexual advances will result in the improvement of a term or condition of employment for the employee.

Other sexually harassing conduct is also prohibited. This includes offensive sexual flirtations, advances, propositions, verbal abuse of a sexual nature, displays of sexually graphic pictures or objects in the workplace, and unnecessary or offensive touching of an employee, for example, patting, pinching, hugging or repeated brushing against another employee's body. Sexual harassment also includes dissemination of sexually

explicit e-mail, graphics, photos, downloads or websites to coworkers, clients and customers within or outside the workplace.

Sexual harassment may also include harassment where the harasser is not an employee of our company, but is a customer or a vendor or a contractor or a member of the general public. If an employee feels harassed by any of these people, they should complain in the same manner as if they were harassed by a co-worker or a supervisor.

Supervisors and managers at all levels are responsible to ensure that the work environment is free from sexual and other forms of harassment. Managers and supervisors who learn of sexual harassment, be it an individual employee complaint, personal observation, or any other source, should immediately notify a human resources representative. The privacy and confidentiality of all such incidences must be strictly maintained by supervisors and managers.

Complaints

As noted above, employees who feel they have been subjected to sexual harassment, or harassment on any other basis, should immediately report the incident directly to their supervisor, human resources representative, general manager, or Corporate Human Resources. An option for anonymous reporting is also available by using the TEGNA Hotline: 800-695-1704.

The facts of the incident will be investigated and the validity of the complaint determined promptly.

If it is determined that a complaint is valid, we will take appropriate disciplinary action against the offender based on the severity of the harassment and the individual's employment history.

Disciplinary action may include written warning, suspension, demotion or dismissal. If the harasser is not an employee, we will take appropriate action to see that the harassment stops.

If it is determined that a complaint is a fabrication, appropriate disciplinary action will be taken against the employee who fabricated the complaint.

There may be times when the truth is impossible to determine, even following a thorough investigation and the company's best efforts to learn the truth. In such an event, the company's policies will be forcefully reiterated and every effort to learn the truth and enforce our policies will be made.

Privacy

To the extent possible, all persons involved in a complaint of sexual harassment, or harassment in any other form, will be given the utmost protection of privacy. Persons

complaining of sexual or other harassment will also be protected from reprisals and retaliation by the company or co-workers as a result of such complaints.

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