ATLANTIC MEDIA EVENTS GUIDELINES

I. Final Control Vested in the Editors

The integrity of Atlantic Media brands is best secured by extending the editorial control—and veto—of Atlantic Media editors over all underwritten events. The work of Atlantic Media live events, therefore, is subject to the final decision of the editors.

Specific Guidelines

- #1 Atlantic Media editors are vested with final control over which events the enterprise will and will not produce. Their decisions are final.
- II. Independence of our Journalists

There is no question that both the events and the journalists can benefit by involving Atlantic Media editorial staff in our events work. Editors and reporters are well-suited to lead panels, lead discussions and interview newsmakers at Atlantic Media events. Further, and especially as outside reporters may be in attendance, Atlantic Media reporters may want to attend our events.

The problems to avoid are the appearance or actual possibility that participation of the reporter in an underwritten event may undermine his or her editorial independence in subsequent work.

Specific Guidelines

- #2 All invitations to Atlantic Media journalists to participate—as speakers, panelists, interviewers, panel moderators, discussion leaders or as guests—must be approved by the editor before any approach to the reporter has been made. The editor has final say in which of his or her staff may be approached and involved.
- #3 The editor takes responsibility to ensure that any reporter involved in Atlantic Media events wants to be involved and believes he or she can maintain editorial independence thereafter.
- #4 Final decision on participation in an event rests with the reporter. No pressure by editors or business leaders may be applied to influence that decision.

III. Transparency of Underwriter(s)

The fact that an event is underwritten and the identity of the underwriter(s) should be communicated to all event participants and to the public at large. The transparency here should be as clear as a page of advertising in our print publications.

Specific Guidelines

- #5 The fact that the event is underwritten and the identity of the underwriter(s) shall be clear and obvious in all written materials describing the event—marketing materials, invitations and all other external documents.
- #6 In the case of all public policy events, the term to be used for event underwriter is, in fact, "underwriter" and not host, co-host. These latter terms are not to be used.
- #7 Atlantic Media will provide summary detail on our publication websites of all events that involve public officials; that detail will include the event topic, date and underwriter for at least the three most-recent events of each publication.

IV. Meeting and Exceeding Government Ethics Standards

Both the Congress and the Executive Branch have promulgated rules for which gifts (including meals) government officials may accept. Though the rules apply to the government official in the first instance— and not to the event host—Atlantic Media wants to ensure that its events cause no problem to any party regardless of who bears the burden of complying with the rule.

Specific Guidelines

#8 Atlantic Media has established compliance standards for all Atlantic Media events involving government attendees that meet and exceed applicable rules and regulations. These standards are not to be met on a "best efforts" basis and must instead be strictly observed.

V. Reviewing the Guidelines

Atlantic Media will remain teachable on event standards; as industry practice evolves so will Atlantic Media practice.

Further Guidelines for Public Policy Events

VI. Open Posture

All Atlantic Media public policy events supported by outside underwriters will be conducted in the open. The posture of Atlantic Media public policy events will be to encourage outside coverage and dissemination of information.

Specific Guidelines

- #9 All Atlantic Media public policy events will be conducted either on-the-record or "on background." On background will allow journalists to report on the content but not attribute comments to specific individuals. Working with the editorial staff, the most-senior leader of each business unit will decide on the choice between on-the-record and on background.
- #10 All Atlantic Media public policy events will be open to outside journalists. Depending on the size of the event, some number of journalists from established news outlets will be invited to attend. A good faith effort, bordering on heroism, will be made to ensure at least one outside journalist does, in fact, attend.

VII. Considered Role for Underwriters

In producing public policy events, broadly defined, Atlantic Media's starting position is to give its underwriters no greater role than is afforded to other guests. The central problem to be avoided is the appearance or the fact of the underwriter having a disproportionate voice in the public policy debate due to financial support.

Specific Guidelines

#11 Underwriter participation in public policy events shall be limited to the role of other guests with only three carved out exceptions.

Exceptions to General Rule

- 1. Underwriter may offer brief welcoming and closing remarks.
- 2. Underwriter may participate on a panel where the editor concludes that the organization has no economic interest in the outcome.

- 3. Underwriter may participate in panels with an economic interest only if:
 - ✓ Panel includes, as well, contrasting views.
 - *and* ✓ Underwriter participation is of compelling editorial interest such that individual would be considered for inclusion without underwriting support.
 - and ✓ Editor and counsel approve of participation.
- 4. For large events, such as the Aspen Ideas Festival and the Washington Ideas Forum, Atlantic Media may support the creation of underwriter breakfasts, lunches or dinners so long as:
 - ✓ Underwriter is a senior executive within the company and not a lobbyist, communications or government affairs professional.
 - *and* ✓ The event is marketed and conducted with clear notice that the event is an "underwriter event".
 - *and* ✓ The room itself is identified clearly as hosting an event in the name of the underwriter.
- 5. *Sponsor Content*: An Underwriter may make a Sponsor Content presentation equal to or less than 15 minutes in length at some point during the Event (e.g., a short summary of research, poll, video, or whitepaper). Content longer than 15 minutes will be allowed by exception if, in the judgment of legal, the content is inherently interesting. The Audience must be informed that the presentation is made on behalf of the Underwriter. As with Sponsor Content on our digital platforms, the presentation must be vetted by the BU head, PR, and legal.

VIII. 360° Policy

Among the distinctive contributions Atlantic Media can make is to bring together diverse parties—representing the full range of views—on matters of public-policy dispute. At least to date, we are seeing that civil and productive conversations still can be had even when all sides of an issue are represented.

With this good in mind, Atlantic Media has chosen as its posture and policy that the major and fully diverse views are represented in discussions of contentious public policy issues. This 360° standard is the distinguishing feature of Atlantic Media public policy events.

Specific Guidelines

- #12 An event that features a single individual to speak or be interviewed definitionally cannot reflect the 360° review of an issue. Apart from that circumstance, all Atlantic Media events, involving contentious public policy issues, shall ensure that major, diverse views are represented.
- #13 In particular, attendees at public policy meals (such as public policy dinners) shall represent the diverse points of view on the issue to be discussed.
- #14 As to panels on public policy issues, diverse points of view should be represented on the panel.