

NATION MEDIA GROUP
EDITORIAL POLICY GUIDELINES & OBJECTIVES

General

The character and philosophy of the Nation Media Group's news and information outlets are shaped by the editorial guidelines and objectives outlined below. These have been discussed and adopted by the shareholders of Nation Media Group, and comprise the broad rules governing all editorial content in our media platforms.

Divided into four parts, they deal with broad and specific issues of policy, professional, operational and administrative guidelines as well as journalistic conduct in the sourcing and compilation of news, features, documentaries as well as editorials and commentaries.

While placing obligations on the Group and every member of the editorial staff, they require the unmitigated personal and philosophical commitment of all editorial executives and staff.

The Board of NMG's Editorial Committee, as well as the respective boards of the Group's subsidiary media companies, are mandated to meet regularly to monitor progress in the achievement of these objectives and the policy guidelines as established and required by both the Group's Board and shareholders.

PART I

(A) POLICY GUIDELINES

The Nation Media Group believes its news and information outlets (See Schedule "A" for list of these outlets) have a vital role to play in the development of Kenya, Uganda, Tanzania, Rwanda and Burundi (the countries of East Africa and elsewhere in Africa where the Group might be present)

This belief is based on the acknowledged responsibilities and influential power of a free Press in a modern society. The Group recognises that:

- Freedoms of Speech and of the Press are basic elements of any democracy or an emerging democracy. A free, independent Press is among the most important institutions in a democratic country.
- As a social institution, the Press discharges crucial duties by carrying information, debates, analytical and critical comments on society. The Press is, therefore, particularly responsible for allowing different views to be expressed.
- The Press protects the Freedom of Speech and of the media and it should not yield to any pressure from anybody or any institution that might want to prevent the free flow of accurate factual information, free access to sources and open debate on any matter of importance to society.

- It is the duty of the Press to publish information that should be in the public domain, on what goes on in society and to uncover and disclose matters that ought to be subjected to public debate, analysis, scrutiny or criticism in keeping with the universally acknowledged principle that the media's primary responsibility is to the people.
- It is the duty of the Press to protect individuals against injustices or neglect committed by public authorities and institutions, private concerns and others.

Core values

1. The Group's news and information outlets must remain independent of vested interests or external influences. NMG is publicly quoted, its structure, ownership and editorial policies known to all. Its news and information outlets are committed to being comprehensive and accurate in content and their commentaries fair and considered. Their constant objective is to ascertain and verify the truth of what they publish insofar as this can be established.
2. Veracity and accuracy in reporting are an integral part of editorial policy and editors will only publish that which they believe to be true, fair and accurate. Every effort will be made to ascertain the factual accuracy of articles through, for instance, cross-checking of facts and the mandatory use of tape-recorders or other recording devices.
3. All editorial content will be selected for its inherent news value and not to appease, augment or respond to political, commercial or any other interests. In this respect, all advertisements and advertising-related material will be signposted as such. Editors and journalists must test the value of each story, report or article by interrogating the extent to which it satisfies the "so what?" element.
4. The Group's news and information outlets will differentiate clearly between views and opinion on the one hand and news and reportage on the other. The former, whether they are the opinions of external/guest contributors or of the Group itself, will be clearly identified in designated columns or programmes. In the case of contributors, articles will carry a biographical line setting out their qualifications and, where appropriate, political stance and affiliation. For broadcast, programmes will carry a disclaimer where the views expressed do not reflect those of the Group. In general, though, the trend must be towards a wise mix and balance of reporting, analysis and interpretative journalism to help our audiences and readers better understand the issues that are part of their everyday lives.
5. The Group's outlets stand for racial, ethnic, religious and communal harmony and political/party tolerance as well as other forms of pluralism: They aim to help audiences of all races, faiths and nations to see events in perspective, and to understand their interrelationships.
6. The Group supports the principles of democracy as they are most widely understood, that is, good governance, transparency and accountability, regular, free and fair elections as well as social equity. The Group also supports the role of responsible and credible Civil

Society Organisations (CSOs) in the promotion of democracy and good governance. It supports and promotes the protection and promotion of human rights and civil liberties.

8. It supports and promotes public debate on matters of national importance with a view to bringing about behavioural and policy change for the common good.
9. As part of its Corporate Social Responsibility, the Group supports and promotes the protection and conservation of the environment whilst promoting sustainable development. The Group also supports the most economically vulnerable members of the society through its various Corporate Social Responsibility Programmes. In this regard, the Group deliberately promotes and encourages environmental journalism, appropriate research and adoption of new technologies aimed at enhancing the quality of human life.
10. It will promote media freedom in the nations where it operates, balancing this value with a well developed sense of responsibility.
11. It will promote the national efforts of the people of East Africa to develop and harmonise their institutions for the common good and will encourage regional integration where this is practicable and demonstrably to the advantage of the peoples of those countries involved. It should bring, where possible, first hand and independent news coverage and views and not exclusively a repetition of articles published by others and agencies.
12. Its vision will not be confined to its immediate market within East Africa but will be driven by the objective of establishing itself as the media of Africa for Africa.
13. The Group's news outlets in their commentary pages and programmes will vigorously support the interests of the underprivileged and disadvantaged groups or persons and will work to combat injustice without fear or favour; they will seek to be sensitive to gender issues, the interests of the rural populations and of all forms of minority.

Role of editors

Editors shall not shy away from objective and generally constructive criticism of any group or person, action or policy where such criticism is considered in conscience to be well founded, based on a full and accurate assessment of the factual realities, and offered in the interests of the public at large.

Social obligations

1. The Group supports a free enterprise, market-driven approach to economic development, but its editors will encourage discussion and debate on alternative ideas. Its news and information outlets aim to appeal to wide audiences within the context of their editorial and marketing parameters and no one sector, community, profession or editorial objective will dominate the media platforms. In this regard, any planned editorial campaigns or crusades on any issue will be referred to the NMG or respective Board editorial committee(s) for prior discussion.

2. Public awareness is an essential ingredient for national mobilisation. In that regard, the Group will support society's efforts to deal with national disasters such as flooding, drought, famine, outbreak of epidemics like the HIV/Aids epidemic, and other forms of humanitarian crises.

Professional obligations

The Group's news and information outlets will be authoritative without being didactic; they will be intelligent and broad in their coverage. They will encourage the intelligent expression of African thought and perspectives by way of regular contributions from outsiders able to offer unique professional expertise and reasoned diverse opinions on topical issues about the continent. They will avoid generalisations where the specific is more accurately appropriate. By their coverage and style, they will maintain a national and international flavour.

A constant search is required for higher literary, fluency and grammatical standards among editorial staff, pre-eminently in the pursuit of legibility, comprehension, accuracy and balance. Specific consideration is given in this area to the question of phrasing of headlines and captions. Constant care will be taken to ensure that headlines accurately reflect the theme and tone of the article they are based on.

Format and design

The typographical layout of the Group's news platforms, including the online editions, must of necessity change from time to time, but the fundamental principle, which applies to print, broadcasting and to online presentations, is to present editorial content in an attractive but disciplined, sober, consistent and non-sensationalist format.

Staff development

The Group is committed to training and developing its editorial staff to internationally recognised best practice standards. Staff recruitment is, therefore, rigorous, the policy being to seek qualified journalists or trainees of proven quality with good educational and professional attainments, who will undergo structured training programmes, including, whenever possible, exposure overseas.

Every effort will be made to maintain geographical, ethnic and gender balance among those employed in whatever capacity in the Group.

PART 11

(A) EDITORIAL OBJECTIVES

This section deals with specific objectives, which place obligations on each member of the editorial staff. They should be treated as mandatory expectations in the individual's day-to-

day editorial work. Their application will be reviewed regularly with the Group Editorial Director.

1. It is the company's objective to make the Group's outlets comparable in authority, balance, credibility and presentation with leading media platforms in other parts of the world. In this regard, it will provide the expertise necessary for a general and marked uplift in professional skills and standards. To pursue this objective, its training editors will assist staff in improving their professional performance. Staff are required to consult their training editor in any area of doubt. They are equally required to take seriously any weakness identified by the training editor in their day-to-day work and make every effort to rectify such weaknesses. The group will seek reciprocal arrangements with other media houses to facilitate limited exchange visits between the journalists of both groups for purposes of improving our and their staffs' professional skills, standards and areas of specialised knowledge.
2. Our media platforms will avoid such "non-news" content as empty statements of a general nature, occasions or releases where publicity for individuals, groups or organisations is the sole dominant objective.
3. Our news outlets must reflect a bias against routine assignments and political or charitable functions that are known to have little or no news value. The outlets will be dominated by evidence of enterprising news management.
4. News stories which come from sources outside the Group will not be accepted at their face value. Background information, names, ages, titles, contrary points of view (if appropriate) will be thoroughly ascertained before a story is submitted for publication. Where further depth is required – either explanation or history – this will always be provided so that news coverage is never untruthful, wilfully misleading, superficial, unbalanced or incomplete. In this regard, the library and the Internet facilities will be used extensively and intelligently.
5. Specialised language and expressions (e.g. such as in medicine, economics, religion, court cases) must be accurately and carefully interpreted into English and Kiswahili usage.
6. Normally, lists of names at official functions should be eliminated from the text of stories.
7. Stories must concentrate on events themselves, not on the names of officials associated with them. A magistrate's name and title, for example, should not be published unless his/her actions, remarks or other involvement are pertinent to the case or the story.
8. Pedantic facts, whose publication is unnecessary, for example, car registration numbers in court and theft stories, lists of minor personal effects, funeral arrangements, etc, should be avoided.
9. Indisputable and straightforward facts should not be attributed to spokespersons. Indirect speech will not be attributed, sentence-by-sentence, to the speaker. One attribution should cover several paragraphs, provided the correct tense is used.

10. Outdated clichés will not be used. Examples: hike, for rise or increase; hail for praise; nab for arrest; probe (in text) for investigate or inquire into, jetting in for flying in. Equally, words such as lash, fire, bash, roast and rap for criticise will not be used in text except in direct speech, and not at all in headlines. Likewise, standard language will be used on the Kiswahili platforms.
11. Except for regional or provincial editions/broadcasts, coverage must avoid the strictly parochial and concentrate on news of national interest. Selection of news will be done with this goal in mind and correspondents will be conscious that their contributions should interest audiences all over the particular country or region. Similarly, non-news events like street and bar brawls, except where they result in large scale violence or involve newsworthy individuals will be avoided.
12. The Group's editorials will base their conclusions on demonstrable and comprehensive research. They will be balanced, constructive and informative and will represent the authoritative voice of the Group and not only that of the writers. Like all other editorial content, leaders will justify the space they occupy in cogent, unrepentive and reasoned arguments. Editorials will be regarded as the flagship of the various media platforms and planned with appropriate care. Except in rare circumstances, they will comment on the most significant events of the day. Like news stories, they should contain facts not generally known. They will not be spiteful, prejudiced, propagandist or extremist; they will avoid the bizarre and offensive and will always maintain standards of decency and good taste. Wording should be temperate and non-inflammatory. Where an editorial is based on an issue in any of the East African countries, efforts must be made to verify the facts with the appropriate officials in the respective countries and not unnecessarily or gratuitously contribute to inter-country tensions.
13. Features, except those clearly identified as those of contributors whose views have been solicited by the newspapers on the basis of their specialist value, will be informative, solidly researched, balanced, simply written and will present facts. "Essay-type" features are forbidden. Features writers and other writers will avoid the assumption that they are participants rather than observers.
14. Feature "fillers" are forbidden. These are categorised as irrelevant space takers, used in the absence of worthwhile material and generally provided by external services. All features must earn the space they occupy. Acceptable articles in that category will include topical world backgrounders, human-interest features of special appeal to the readership and those with particular relevance to East Africa.
15. Special attention must be paid to the activities of the East African Community and the institutions related to it to enable citizens of member countries – Kenya, Uganda, Tanzania, Rwanda and Burundi – to understand their place in and contribution to the wider community of nations.
16. In its coverage of African continent, the Group's outlets will originate original Africa content positioning NMG as the Media of Africa for Africa and thereby counterbalancing editors' potential excessive reliance on international news agencies for news about the

continent. As a starting point, editors are required to use NMG journalists or commissioned reporters/writers to report on Africa, where possible, in order to benefit from the investment in training and the understanding of, for instance, the Group's Editorial Policy and culture. In particular, every effort must be made to ensure full utilisation of NMG editorial resources in the coverage of events happening within East Africa where the Group has subsidiary companies with appropriate focus being placed on the interpretation and detailed discussions and analysis of those events.

17. Unsolicited features submitted for publication by commercial and other vested interests and pressure groups will, generally, not be accepted. If, exceptionally, any such feature is judged to have particular news value and be worthy of publication, it will be edited to correspond with the style of the particular publication or other outlet and its source will be clearly identified.
18. Women's coverage should not be confined to cosmetic and domestic issues, but must concentrate on the many important women's issues in East Africa today. The contents in the women's pages or programmes, where these exist, must be properly discussed and planned at editorial conferences and should be relevant, topical, professionally written and presented.
19. Coverage of news related to the youth should go beyond the apparent preoccupation with simple consumerism and all forms of instant gratification and should aim at focusing on the youth programmes that add value to the general development of societies and expressing the views, raising questions and focusing on preoccupations of the region's youth.
20. Editors must make every effort to eschew material that is vulgar or tasteless. Such content as irresponsible celebrity gossip, salacious writing or stories has no place in any of our platforms and only takes up valuable space that could be better dedicated to more edifying issues. (Any inserts, pullouts, supplements and radio/TV programmes targeting audiences with such content shall be reviewed and readjusted or dropped altogether).
21. Pictures/graphics, including cartoons that make our media platforms lifeless and dull will be automatically rejected unless they are of major significance. Pictures/graphics will be lively and well composed and earn their place in our platforms.
22. Public relations material, both written and pictorial, must be used judiciously. This should not, however, prevent the use of stills in picture reviews, company results and other Press releases where such material concerns topics of genuine public interest. All stories based on PR material so used will, however, be re-written in the news style of the Group, any self-indulgence removed and its inclusions judged solely on its news value. Special care will be taken, however, not to alter or misrepresent the essential factual content of the PR communication.
23. Foreign or international stories will not always be confined to their designated sections, but will, depending on their newsworthiness, be considered as lead stories for the day, taking cognisance of the fact that the public needs to be informed of significant events outside its

own national borders. However, editors will take particular care to edit such stories for style, tone and taste, bearing in mind the African context of their primary audience.

24. Sports coverage must reflect both popular and minority interests. The sports sections will carry, regularly and without fail, the results and, where appropriate, commentaries on all international and national sports events where there is a reasonably significant following in the East African region.
25. The standard of sports writing and presentation will not deviate from those required elsewhere in the Group's platforms.
26. Columnists and commentators (on staff or outside) should always be identified not just by name, but also by affiliation.
27. The Group will practise issue-based as opposed to excessive or continuous personality-based journalism that tends to create an impression that the issues are driven by personal agenda and vendetta and in the process eschews journalism that is based on unattributable and unsubstantiated rumour and gossip in relation to public figures.
28. While recognising the fact that as individuals, journalists would ordinarily have their own political views and/or political party affiliations or religious affiliations, journalists working for the Group are expected to subordinate their individual political or religious views and to remain apolitical and neutral on religious matters in the course of discharging their official duties so as not to allow their political or religious affiliations or views to influence their editorial judgment.
29. As part of the effort aimed at encouraging enterprising news management, the Group will, through the NMG Editorial Board Committee, organise periodic Editorial Agenda Setting Sessions to discuss and debate editorial management and direction with the respective editorial staff.
30. Board's Oversight Responsibility on Editorial Matters: The Group's Editorial Board Committee will, on behalf of the Board, bear the principle oversight responsibility for the Group's operations which concern the editorial content of the Group's publications and broadcast activities and as such, the Committee will serve as a leading guardian and custodian of the Editorial Policy Guidelines and Objectives.
31. Periodic Reviews of the Editorial Policy Guidelines and Objectives: The Editorial Policy Guidelines and Objectives will, under the Board's guidance, be subjected to periodic reviews from to time.

Journalists should regularly refer to these guidelines to assist them in structuring their writing, production and presentation to the required standard. Performance will be judged on their ability to interpret and implement these guidelines.

(B) OPERATIONAL AND ADMINISTRATIVE OBJECTIVES

1. The Group's management will ensure that all journalists employed on the English language platforms are able to write and speak clear, concise English and are fully up to date with

the modern usage of the language. Likewise, journalists employed on the Kiswahili language platforms will be proficient in the written and spoken use of the language. All these journalists must have a reasonable numeric competence.

2. With the basic objective of encouraging a culture of meritocracy, recruitment will be based on aptitude tests and oral interviews, and as much as possible reflect the social, gender, religious, and other demographic diversities of the respective countries in which NMG operates.
3. Editorial conferences will be routinely held to review the planned content for print, broadcasting and the online publication. The conferences will be held at appropriate times in the mornings and afternoons and will involve the assigning editors, chief subs and managing editors.
4. The morning conference will be both a post-mortem session concerning the previous day's efforts, and a comparison with the competing publications as part of efforts to monitor and improve on quality, as well as a comprehensive review of the pending news docket.
5. The afternoon conference will review coverage at hand and possible later developments, selecting possible lead stories for each medium, identifying content from NMG's African correspondents, for syndication and for common usage across the regional platforms.
6. The weekly publications will convene in conference on Monday or Tuesday mornings to review their previous week's performance and to plan coverage for the new week. Given the relatively small size of their staff, the conferences will be attended by all staff and will be chaired by the respective managing editors.
7. Regional or bureau office staff will similarly hold meetings as appropriate and submit a docket of their pending news coverage to the respective editor in time for discussion at the morning conference. In all areas, regular updates of the news or story dockets will be imperative.
8. News collection and management are the powerhouse of the newspaper. Its organisation must be lively, flexible, enterprising and well informed. All reporters will be deployed on arrival not only to regular diary assignments (e.g. police, courts and hospital calls), but also to running and developing stories – sequels to earlier headlined events, building news features, and inquiring into leads and tips.
9. The news editor(s) will analyse the subject content of the particular publication and the competition, and record all forthcoming events and developments in the diary, specifically including all follow-up possibilities.
10. The news editors' diary will be dominated by evidence of enterprising news management and NOT routine assignments and political or charitable functions that are known to have little or no news value.
11. As news coverage is a round-the-clock affair, the news desk will have effective coverage up to midnight throughout the week. Late news will appear in the following day's paper, not the day after. Reporters and sub-editors will be assigned to night duty and the

publications and broadcasts will be sufficiently flexible to accommodate any late newsbreaks.

12. Whether or not they are at the office or on assignment, all journalists are obliged to be on the alert for news events or background information of interest to our news outlets, particularly in their specialised fields.
13. The Internet editions will have full interactivity of stories and offer Nation Media website visitors enhanced utility by enabling easy printing, e-mailing, feedback and customisation.
14. Stories acquired from the print editions for publication on the website will be repurposed and edited to augment their international significance and particular interest to the African Diaspora.

PART III

ETHICAL PRINCIPLES: CODE OF CONDUCT AND ETHICS FOR NMG JOURNALISTS

The following code is intended as a guide for everyone working for the Nation Media Group and is based on the premise that all journalists have a duty to maintain the highest professional and ethical standards. It is founded on the individual's fundamental right to be informed and to freely receive and disseminate information.

Accuracy and fairness

1. The fundamental objective of a journalist is to report fairly, accurately and without bias on matters of public interest. All sides of a story should be reported. It is important to obtain comments from anyone mentioned in an unfavourable context.
2. Whenever it is recognised that an inaccurate, misleading or distorted report has been published, it should be corrected promptly. Corrections should report the correct information and not restate the error except when clarity demands. Ideally, corrections should be made in a regular format and similar position as promptly as possible after the error has been detected.
3. Corrections do not normally require an apology and apologies should normally be made on the basis of legal advice.

Opportunity to reply

A fair opportunity to reply to inaccuracies should be given to individuals or organisations when reasonably called for. If the request to correct inaccuracies in a story is in the form of a letter, the editor has the discretion to publish it in full or its abridged and edited version, particularly when it is too long. However, the editor should not omit or refuse to publish important portions of the reply/rejoinder, which effectively deal with the accuracy of the offending story. If the editor doubts the truth or factual accuracy of the reply/ rejoinder, even then, it is his/her duty

to publish it with liberty to append an editorial comment doubting its veracity. Note that this should be done only when this doubt is reasonably founded on impeccable evidence in the editor's possession. The editor should not, in a cavalier fashion, without due application of mind, append such a note as: "We stand by our story."

Letters to the editor

In the case of the print media, an editor who decides to open his columns on a controversial subject is not obliged to publish all the letters received in regard to that subject. He/she may select and publish only some of them either in their entirety or the gist thereof. However, in exercising this right, he/she must make an honest attempt to ensure that what is published is not one-sided, but presents a fair balance between the pros and cons of the principal issue. The editor has the discretion to decide at which point to end the debate in the event of a rejoinder upon rejoinder being sent by two or more parties to a controversial subject. It is the Group's aim not to suppress the publication of letters to the editor merely on account of the editors' disagreement with the underlying messages or arguments. In the case of the electronic media, a broadcasting licensee who presents a programme in which controversial issues of public importance are discussed shall make reasonable efforts to fairly present significant points of view either in the same programme or in a subsequent one forming part of the same series of programmes presented within a reasonable period of time in substantially the same time slot.

Additionally, a person whose views have been criticised in a broadcasting programme on a controversial issue of public importance shall be given a reasonable opportunity to reply should he/she so request.

Unnamed sources

Unnamed sources should not be used unless the pursuit of truth will best be served by not naming the source or in the event the source requests his/her anonymity to be respected. When material is used in a report from sources other than the reporter's, these sources should be indicated in the story. If unnamed sources are quoted, the article should indicate the reason why the source did not want to be disclosed.

Confidentiality

In circumstances where complete confidentiality is assumed as a condition of obtaining the story, that situation needs to be respected and considered according to the existing legal framework. In general, journalists have a moral obligation to protect confidential sources of information.

Misrepresentation

1. Journalists should generally identify themselves and not obtain or seek to obtain information or pictures through misrepresentation or subterfuge.
2. Unless in the public interest, documents or photographs should be used only with the express consent of the owner.

3. Subterfuge can be justified only in the public interest and only when material cannot be obtained by any other means. The public interest includes: Detecting or exposing crime or serious misdemeanour or anti-social conduct; protecting public health or safety; preventing the public being misled by some statement or action of an individual.

Obscenity, taste and tone in reporting

The media should not publish anything that is obscene, vulgar or offensive to public good taste. A story, photograph or drawing/cartoon of questionable taste should have significant news value to justify its usage.

Generally, what is in good taste is to be determined by the prevailing social norms. But the following basic tests should be applied.

1. Is the depiction of a particular scene and the language used likely to be regarded as filthy, revolting, repugnant, dirty or lewd?
2. With regards to pictures, the following should offer guidelines:
 - (a) Is it vulgar and indecent?
 - (b) Is it mere pornography?
 - (c) Is its publication meant merely to make money by titillating the sexual feelings of adolescents and adults among whom it is intended to circulate? In other words, does it constitute an "unwholesome exploitation" of sex for the sake of money?
 - (d) Is it invasive of anyone's privacy? If this is the case, a further question should then be asked as to whether the use of any such photo is nonetheless justified by a clear and indisputable public interest in doing so.
3. In the same vein, publication of photographs showing dead or mutilated bodies, bloody incidents and abhorrent scenes should be avoided unless the publication of such photographs will serve the larger public interest.
4. Television stations especially must exercise great care and responsibility when presenting programmes when a large number of children are likely to be part of the audience.

Paying for news and articles

When money is paid for information, serious questions can be raised about the credibility of that information and the motives of the buyer and seller. Therefore, in principle, journalists should avoid paying for information.

Plagiarism

Using someone else's work without attribution - whether deliberately or thoughtlessly - is a serious ethical breach. However, borrowing ideas from elsewhere is considered fair journalistic practice so long as the source is acknowledged.

Words directly quoted from sources other than the writer's own reporting should be attributed. In general, when other work is used as the source of ideas or stylistic inspiration, the final result must be clearly different and distinguishable as the original work of the reporter.

Discrimination

In general, the media should avoid prejudicial or pejorative references to a person's race, tribe, clan, religion, sex or sexual orientation or to any physical or mental illness, handicap or political orientation. These details should be eschewed unless they are germane to the story. Everyone should be accorded equal treatment as news subjects or sources and journalists should not deliberately deny the right of any group to exposure in the media. Generally, a reference to one's nationality (e.g. Ugandan, Kenyan, or Tanzanian) is less contentious than a reference to race (e.g. white/black)]

Recording interviews and telephone conversations

Except in rare and justifiable cases, journalists should not tape anyone in the course of an interview without that person's knowledge and agreement. An exception may be made only if the recording is necessary to protect the journalist in a legal action or for some other compelling reason such as coverage of public meetings and if other approaches don't work. On the other hand, the use of recorders for interviews, speeches or at press conferences with the knowledge of the subject is encouraged to protect against error and to protect against possible charges of misquotation.

Privacy

The public's right to know often needs to be weighed vis-à-vis the privacy rights of people in the news. Intrusion and inquiries into an individual's private life without the person's consent are not generally acceptable unless public interest is indisputably involved. Public interest must itself be legitimate and not merely based upon prurient or morbid curiosity. Things concerning a person's home, family, religion, tribe, health, sexuality or sexual orientation, personal life and private affairs are covered by the concept of privacy excepting where these impinge or can reasonably be presumed to impinge upon the public well being.

Intrusion into grief or shock

In cases involving personal grief or shock, enquiries should be carried out and approaches made with sympathy, empathy and discretion.

Financial journalism

Even where the law does not prohibit it, journalists should not use for their own profit financial information they receive in advance of its general publication nor should they pass that information to others. They should not write about shares or securities in whose performance

they know that they, their close families or associates have a significant financial interest, without disclosing the interest to the editor. They should not buy or sell, either directly or through nominees or agents, shares or securities about which they intend to write in the near future.

Utmost care should be exercised by journalists in giving any interpretation to financial information.

Conflict of interest and unfair advantage

The Nation Media Group practices a policy of zero-tolerance of corrupt practices. In this regard, its journalists and editors must be free of obligation to any interest other than the public's right to know the truth. Gifts, bribes, brown envelopes, favours, free travel, free meals or drinks, special treatment or privileges can compromise the integrity of journalists, editors and their employers. Journalists, editors and their employers should conduct themselves in a manner that protects them from conflicts of interest, real or apparent. It is important not only to avoid conflicts of interest but also the appearances of such conflicts. In this connection, all situations capable of creating undue familiarity will be avoided or handled cautiously.

In addition, journalists and editors must not allow their political or religious affiliations; views or morals and ethics influence their editorial judgment.

Innocent relatives and friends

The media should generally avoid identifying relatives or friends of persons convicted or accused of crime, or otherwise unfavourably featured in news stories, unless the reference to them is necessary for the full, fair and accurate reporting of the crime, legal or other proceedings.

Acts of violence

The media should avoid presenting acts of violence, armed robberies, banditry and terrorist activities in a manner that glorifies such anti-social conduct. Also, newspapers should not allow their columns to be used for writings which have a tendency to encourage or glorify social evils, warlike activities, ethnic, racial or religious hostilities.

Ethnic disputes/clashes/conflict interstate conflicts

News, views or comments relating to ethnic or religious disputes/clashes/interstate conflicts should be published after proper verification of facts and presented with due caution, balance and restraint in a manner which is conducive to the creation of an atmosphere congenial to national harmony, reconciliation, amity and peace. Sensational, provocative and alarming headlines are to be avoided. News reports or commentaries should not be written or broadcast in a manner likely to inflame the passions, aggravate the tension or accentuate the strained

relations between the parties concerned. Equally so, content with the potential to exacerbate communal animosity or national conflict should be avoided.

Headlines not to be sensationally provocative, and must justify the matter printed below them

In general, provocative and sensational headlines should be avoided; headings must reflect and justify the matter printed under them; headings containing allegations made in statements should either identify the body or the source making it within the same headline or at least carry quotation marks.

Judicial acts

The media/journalists should, as a matter of caution, avoid unfair and unwarranted criticism which by innuendo attributes an oblique or extraneous motive to a judge or any judicial officer for performing an act in the course of his/her official duties even if such criticism does not in law amount to contempt of court.

Editor's responsibility

The editor shall assume responsibility for all matter, including advertisements, published in the print media or broadcast on radio or television.

Comment, conjecture and fact

Journalists should distinguish clearly in their reports between comments, conjecture and facts. More importantly, they should write in such a manner that the reader is able to distinguish between comments, conjecture and facts.

Protection of children

Children should not be identified in cases concerning sexual offences, whether as victims, witnesses or defendants. In particular, a TV broadcast, that for reasons of completeness cannot avoid using footage where such children are a central theme, must use every trick in the book to mask their identities. Except in matters of public interest, like in cases of child abuse or abandonment, journalists should not normally interview or photograph children on subjects involving their personal welfare in the absence of or without the consent of a parent or other adult who is responsible for the children. Children should not be approached or photographed while at school without the permission of the school authorities.

Victims of sex crimes

The media should not identify victims of sexual assault or publish material likely to contribute to such identification. Such exposure does not serve any legitimate journalistic or public interest and may bring social opprobrium to the victims and social embarrassment to their relations, family, friends, community or religious order to which they belong. Editors have a

moral obligation to ensure they leave no margin whatsoever that could lead to the identification of such victims.

Use of pictures and names

As a general rule, the media should apply caution in the use of pictures and names and avoid publication or distribution where there is a possibility of harming the person(s) concerned unless there is a substantial public interest served by such use. There should be no identification of a person or persons in a photograph unless their identity is absolutely certain.

Pre-publication verification of reports

Whenever editors receive a report, photograph, radio or television programme or video containing defamatory or derogatory imputations or comments touching on the public conduct or character of an individual or organisation, they should, before using the information, check, with due care and attention, its factual accuracy with the person or organisation concerned to elicit comments or reaction and publish the same.

If responsibility is disclaimed, this determination shall be explicitly stated beforehand.

Advertisements

The media will not allow any advertisement or commercial that is contrary to these ethical principles.

SCHEDULE (A)

NATION MEDIA GROUP'S CURRENT NEWS AND INFORMATION OUTLETS

Category 1: Print titles

Kenya

1. Daily Nation
2. Saturday Nation
3. Sunday Nation
4. The East African
5. Taifa Leo
6. Business Daily

Uganda

1. The Monitor
2. Sunday Monitor

Tanzania

1. Mwananchi
2. Mwananchi Wiki Hii
3. Mwanaspoti
4. The Citizen
5. Sunday Citizen

Category II: Electronic media

Kenya

1. NTV
2. Nation FM
3. www.nationmedia.com
4. <https://nation.africa/kenya>

Uganda

1. KFM
2. <https://nation.africa/uganda>
3. NTV

Tanzania

<https://www.mwananchi.co.tz/mw>

APPENDIX A

NMG - MANAGEMENT OF OP-ED CONTENT AND ELECTION COVERAGE

Introduction

General Elections and political activities in East Africa provide a crucial opportunity for us to reaffirm our position as a dependable, credible, independent and responsible media organisation that is anchored in the highest standards of professional journalism. It should be a hallmark of NMG's editorial content that it comes from an independent perspective with no agenda either favouring or opposing individual, political party, interest group or government. Our time-tested and documented editorial policy guidelines and objectives, sanctioned by the board and approved by our shareholders shall be our guiding principles.

In particular, our news coverage and general management of political content shall seek to underscore our position as independent media that contributes to promoting and entrenching democratic culture through informed debate, intelligent and rigorous analysis as well as prudent review of predictable consequences of actions and policies.

In covering political campaigns and the election itself, our role shall remain one of thought stimulation, explaining and informing in order to help voters make intelligent decisions on the basis of knowledge, and signal to the political leaders that the public is vigilant and will not be swayed by untruths and spin. To achieve this, our coverage will go beyond reporting what newsmakers, including politicians, say to analysing the underlying issues and examining the truthfulness of the platforms of the various contenders.

Our op-ed pages and other sections for political commentary shall remain open to all as a platform for debate; great care being taken to capture East Africa's rich diversity of political thought and opinion. Letters to the editor covering all views and positions will also be given appropriate space in our newspapers.

In all this, we shall adhere to the highest standards of accuracy, fairness, impartiality and balance in reporting. Equitable coverage of all serious political actors will be ensured through strict application of a comprehensive set of election coverage guidelines.

NMG shall neither endorse nor support any candidate or party, or be seen to be favouring a particular set of policies unless it is on something that the group has a pre-existing position – e.g. press freedom, but it will facilitate meaningful debate on policies promulgated by the various political players.

For the avoidance of doubt, these guidelines extend to our online editions, and apply not just to the stories that we choose to publish, but also to the online discussion forums.

Proposed management of op-ed content

In order to achieve the stated objective, we shall:

Establish a distinct election platform by opening our key commentary pages and current affairs slots on our tv to presidential and party opinions.

- Invite political parties to identify spokespersons who can respond to questions or clarify issues for the media when the need arises and to facilitate our contacts with party leaders.
- Reinforce managing editors' responsibility for generating and managing op-ed content.

Election Platform Debates

Print products: The Election Platform will comprise a special series of opinion pieces by presidential candidates and their parties. It will be published twice a week.

Where NMG feels the candidates and parties have failed to rise beyond partisanship that is poisoning the political atmosphere and lowering the standards of public discourse, we shall invite respected public figures to restore dignity and steer the argument(s) back to the issues that matter to the East African people. If this is not possible, NMG might, in exceptional circumstances, itself intervene with an article aiming to achieve the above objective.

The Platform will provide an opportunity for the invited contributors to explain their vision, perspective of issues and programmes or, simply, to respond to a topic in the news. However, in order to maintain a balance between the views of rival political parties, unsolicited contributions, by known party functionaries or sympathetic experts, for instance, will be factored into the overall equation.

To demonstrate transparency, articles by editors and journalists in the employ of NMG shall be flagged with a disclaimer. Such articles shall also be factored in the spread of points of view to ensure the desired balance is achieved.

Presidential candidates' pieces will occupy the space alongside the editorial. Two party pieces, of equal length, will take up the opposite page. Where longer pieces are submitted, the space provided will be adjusted accordingly. However, great care will be taken to ensure that no single party has an edge over the others in terms of the number of articles published. The editorial director will be the final arbiter in this regard.

Articles submitted by presidential candidates will carry their bylines. In this way, the platform will distinguish itself as a valuable and respected forum for presidential candidates to speak directly to the voting public.

The Platform page will always have the same look, shape and size, with equal space given to graphics/pictures. The headlines and body type will be the same as in the rest of the paper. The only distinguishing feature will be the bold branding of the series as Election

Platform. Standardised page one “refers” and carefully crafted promotion ads will be used to draw attention to the series.

Before launching the Election Platform, meetings will be held with political party leaders to explain our strategy/approach and give them guidelines on what we expect. By the same token, we shall also give our commitments of fairness and impartiality to them.

These “out-reach” meetings will be coordinated by the editorial director and will involve managing editors and the op-ed editor.

A file will be maintained by the editorial director to record such meetings and facilitate follow-up discussions and implementation.

To maintain the desired balance, articles published on the same day will always be from different parties.

Equally, a policy of minimal editing shall be rigorously applied so as not to materially alter the import of the message. And where contributions are rejected for reasons of taste or otherwise, the contributors shall be advised accordingly.

Contributions will be managed on a strict timetable. Where invited parties or candidates fail to respond, this shall be duly noted in a footnote on the particular page. However, because over time this failure could give the impression that we are not trying enough or that the candidates or parties do not trust us, steps shall be taken to correct this situation through articles generated by us and published under an agreed byline, after exhaustive internal discussions.

All contributors will be prominently identified with their affiliations - including by repeated overlays on TV and regular reminders on radio.

The Election Platform will be boldly branded and its intended objective highlighted in order to distinguish it from the normal op-ed content, which shall continue to be published.

Role of editors

Managing editors will screen all op-ed content and will be actively involved in sourcing or developing it. A committee of managing editors and the op-ed editor, to be chaired by the editorial director, will draw up a time-table for the Election Platform and work out the logistics of managing invitations to the targeted contributors. The invitations will be made either through personal contacts or written solicitations.

In assessing unsolicited election-related op-ed articles, editors shall ensure that these are:

- Cogently argued.
- Topical.
- Issue-driven rather than personality based.
- Outstanding either for their freshness of perspective or new information.
- Sober, balanced, and not strident or shrill.

- Truthful, so far as this can be established.
- Drawn from a broad-based platform to ensure diversity of political thought.
- Are not written by people, however objective they might sound in the article, who are too closely associated with particular candidates or parties.

Editors will be required to manage the selection carefully to ensure balanced allocation of space.

Sourcing

Overall action plan

- General topics or subjects for opinion pieces shall be identified at two levels: Firstly, at the regular agenda-setting sessions attended by members of the Editorial Board Committee and senior editors and, secondly, at daily meetings chaired by the editorial director or his deputy and involving the senior editors.
- The daily meetings, particularly, will identify the appropriate commentator or opinion writer either from our data bank of specialist writers or usual contributors.
- The morning editorial conference will continue to discuss ideas for the general content of our news platforms.
- The Sunday Nation, which has developed itself as our stable's political paper, is the one title that is most exposed to the risk of manipulation by election contenders. A significant portion of its commentaries and analyses comes from election contenders or sympathetic experts. In this respect, our professed policy of independence is significantly diluted by the preponderance of "opposition content", some of it dressed up as analysis. The Election Platform is expected to bring the much-needed political balance, clearly distinguishing between commentary and opinion pieces on the one hand, and straightforward analytical ones on the other. The paper will, therefore, review its current pool of political analysts, some of whom are election contenders, to ensure that we do not unwittingly give such individuals a platform for their campaigns. Where it becomes necessary to drop such analysts, their roles will be assigned to journalists.
- The themes for analyses assigned to journalists will be agreed on beforehand with the editors.
- Where political analyses are bylined generically (Sunday Nation Team) or by a staff, particular care shall be taken to ensure that these articles avoid judgmental language, political stereotypes, and do not harangue readers.

For general content management on weekends, a duty roster will ensure the availability of a senior editor for gate-keeping duties.

Review mechanism

- Op-ed content will be routinely reviewed at the morning 10 o'clock editorial conference.
- Both the editorial director and duty managing editor will review the Political Platform content/op-ed before printing.
- The Editorial Board Committee will convene whenever a crisis that warrants its attention comes up. A summary report will be provided to the committee by the editorial director.
- The Editorial Board Committee will interact regularly with editors to reinforce the editorial objectives relating to op-ed content.
- Management will continually impart these objectives to staff.

Advertisements

Editorial gate-keeping will be extended to all political advertorials and advertisements. All such advertisements and advertorials shall be referred to the editorial director/group managing editor or managing editor on duty for vetting. A deadline of 3 o'clock for submission of ads or artwork will be strictly enforced to ensure that the editor has sufficient time to review the material before publication. Any ad(s) coming in after the deadline will be rejected outright. Pressure of time will not be accepted as an excuse for running ads that do not bear the editor's mark of approval.

All advertorials and political advertisements shall be boldly branded as advertiser's announcements.

They shall be vetted for:

- Veracity of content.
- Taste and fairness.
- Truthfulness.
- Potential to inflame public opinion.
- Risk of defamation.
- Potentially offensive illustrations/images

NOTE: No political advertisement will be published or aired on the day of the election.

Election coverage

As indicated earlier, the election period gives us a crucial opportunity to reaffirm our credibility with the public. For this reason, all editorial staff are required to familiarise themselves with the Guidelines for Election Reporting as may be issued from time to time by the various media

councils or regulators in East Africa. In addition, the following shall obtain for our particular purposes:

- Strict adherence to accuracy and fairness.
- Utmost integrity to ensure journalists/editors do not unduly keep the company of political contenders, accept payments, gifts or favours from political candidates, parties or their agents. A policy of zero-tolerance will be maintained and any proven infringements will be punishable with instant dismissal.
- Journalists/editors are barred from political activism.
- Editorial vigilance to ensure objective/fair description of candidates and political events. Subjective descriptions such as mammoth or huge rallies, popular candidates, etc, will be eschewed.
- Ensure all descriptions are based on measurable fact or attribution to credible sources.
- Maintain a fair focus on all political parties and candidates.
- Careful selection of pictures and captions to ensure they do not unwittingly send the wrong message or distort the truth. In this regard, no editing shall be done to either diminish the size of crowds or to enhance them. Where the impression created by a truthful photo is an issue, a different one shall be chosen, rather than resort to the aid of Photoshop.
- Careful monitoring and review of headlines on all articles to eliminate biases or inaccuracies.
- Proper management of political/campaign rallies to ensure balanced coverage.
- Avoiding the temptation to run sensational but possibly biased or incomplete stories just to sell papers.
- Taking care to ensure our journalists do not let others dictate and, or, influence their coverage or treatment of stories.
- Covering the good news emerging from campaign rallies as well as the bad news, e.g. violence, chaos. Care shall be taken to ensure a sense of proportion, so that the coverage of a few violent incidents, for example, is not handled in such a manner that they create an impression that they are happening more often than they actually are.
- From a management perspective, it is essential to let readers and viewers know how we intend to cover the elections and encouraging their participation. To give this initiative the desired visibility, it will be necessary to have it formally launched by the NMG Chairman. The launch will be followed with appropriate editorial messages in our news outlets.
- Being truly representative in our coverage.
- Provide the facts as they are and not as some would wish us to see them.

- Placing emphasis on issues rather than personalities, except where their character or actions has material bearing on the election. A candidate who beats his spouse in circumstances where our reporters were present or can verify it during the campaigns and then takes to the stage to preach against domestic violence, would rightly be exposed as an abuser whose word should not be trusted.
- Careful monitoring of humour and satirical pieces, including cartoons, to eliminate any risk of a deliberate campaign by the authors against an individual or party. In particular, cartoons will be sketched well in advance of publication – before noon everyday – for the editor to review.
- Use of tape-recorders – and videotapes in the case of TV – at all campaign meetings, press conferences and interviews and retention of such recordings, for at least a period of up to twelve months from the date of recording, will be enforced.
- Rotating reporters to eliminate the possibility of undue familiarity with election contenders and hence the risk of biased reporting.
- Where the incumbent president is running for re-election, care must be taken to ensure that the coverage of his regular actions as head of state is not done in such a manner as to constitute a campaign for him/her.
- From time to time NMG will commission public opinion polls to establish trends for better decision-making and informed public debate. These will be handled cautiously and at the highest management level with the involvement of the Editorial Board Committee. The same rigor will be applied to the findings of polls commissioned by independent bodies.

Election coverage by Nation Broadcasting Division

Introduction

As media that are used for breaking news, the challenge to achieve objective or even-handed coverage on TV and radio is extremely important. News managers and producers will be working against tight deadlines to script their news bulletins and may be tempted to broadcast unchecked material. Consequently, the onus will be even greater on the broadcasting managers to ensure the process is tightly controlled and managed to achieve the desired standards of coverage. These standards remain the same as those enunciated above for the print division insofar as the accuracy, objectivity and balance of reporting are concerned.

Similarly, the rules of conduct for journalists' and editors' apply to both the print and broadcasting media.

The action plan

It is expected that the Electoral Commission will issue election coverage guidelines for the media, particularly the electronic. We shall draw from this as far as that is practicable. Essentially, our objective shall be to ensure fairness and balance. To achieve this, NTV news editors and reporters will:

Ensure there is a news angle to the story

- Reporters must ensure that they do not become repetitive on issues already covered. If nothing new arises from press conferences or political rallies then an exclusive must be sought to interview the candidates on the issues that have not been addressed.

Countercheck all statements

- Reporters will verify the veracity of statements made by politicians and where allegations are made against a candidate then every opportunity will be made to grant the affected candidate the right of reply.

Strive to achieve balance between competing standpoints

- Always strive to be objective leaving aside any political inclinations.

Avoid personalising issues and mud-slinging

- The temptation to put politicians on air, fighting and calling each other names will be very strong but must be avoided or left for satire. Reporters will resist the temptation to be drawn into political battles that do not add value to our news coverage.

Take politicians to task over utterances

- Reporters will take politicians to task over any public statements that are careless and do not add value to national cohesion or the quality of public debate. If confused or unclear about the utterance, reporters will be expected to ask for clarification(s).

Source background information on stories

- All stories will be put into context to ensure the audience clearly understands the story.

Get feedback from the people

- When covering political rallies reporters will endeavour to get the views of the people (e.g. - Do they understand what the politician is saying? Do they agree? Are the issues that touch their lives being addressed?)

Differentiate fact from opinion

- In all stories, reporters will not let the opinion of a leader or source override the fact of the matter.

Live coverage

Candidates' requests for live coverage shall be considered in the same way as paid advertising. They shall bear the cost of all such broadcasting, like other paid advertising.

However, the material shall be run on a time delay of one minute to allow for editing out of content that may violate the guidelines.

Party selection process

Even as we plan to provide free airtime, the process of identifying the deserving parties will be difficult and challenging. Previous elections have thrown up an unwieldy number of parties and candidates. We can, therefore, always expect crowded field of contenders. We must design a screening process to determine which parties and presidential candidates qualify for consideration. The following guidelines attempt to do this:

- Is the party registered?
- Is it participating in the election?
- Evidence of activities prior to elections.
- Evidence of membership.
- Seriousness of purpose of its leadership

Beyond political programmes, we expect parties and candidates to utilise our media for political advertisements. These will clearly be flagged as such. These advertisements will be scheduled to run on NTV provided they are not:

- Inflammatory;
- Tasteless;
- Inciting;
- Defamatory;
- Plagiaristic;
- Solely aimed at attacking their opponents;

Political advertisements

In the past, presidential candidates dominated most media advertisements as few prospective MPs could afford the costs. This is unlikely to change in the future.

No restrictions are proposed on the number of advertisements a party or candidate can afford to buy airtime for. However, the screening procedure will be the same as that applied to print advertisements.

The same strict deadline procedure proposed for print shall apply and no material will be broadcast before vetting by the editorial director, or his deputy, working in close liaison with the managing director for the broadcasting division.

Monitoring process

There will be a weekly high level review of our coverage by the print and broadcast editors, attended by the NBD Managing Director and the Group Managing Editor.

Uniformity of content across our media will be ensured through an election desk to be set up nearer the time of campaigns, the active participation of the multi-media editor and the rigorous application of the agreed rules and standards.

As elections tend to generate a lot of quacks masquerading as journalists, we intend, through initiatives like that of the Media Owners Association in Kenya, etc, to make public statements against solicitation for favours in return for favourable media coverage. Internally, a policy of zero-tolerance will be enforced.

Conclusion

Influence-peddling from politicians, personal biases from editors and journalists, and sloppy management of the election coverage are some of the key risks to watch out for. These guidelines are intended to address these risks. The NMG Editorial Board Committee shall continue to play a pro-active role, initiating discussions with the Management to strengthen the agreed guidelines.