

Quintillion Media Private Limited

Editorial Code of Conduct

Version 3.0

Contents

Preface	4
General Rules of the Game!.....	4
Access to Information	4
Accuracy of Content.....	4
Content Credits	7
Corrections & Clarifications	7
Privacy.....	7
Secret Recording.....	8
Information Sources (Anonymous).....	8
Flagging Problematic Content For All Quintees.....	9
Professional Conduct	9
Reporting.....	10
Plagiarism/Copyright	11
Working Guide To What Constitutes Public Interest.....	11
Legal Compliance	11
Social Media & Blogs.....	16
Managing Contributor Content	20
Editorial Guidelines & SOP For Video Content	16
Affiliations & Associations	23
Awards, Gifts & Freebies.....	23
Business & Financial Dealings and Reporting	23
Personal Relationships.....	24
Political Indifference	24
Professional Influence.....	24
Public Speaking & Writing.....	24
Applicable Laws.....	25

Reviews25
Restriction on Dual Employment25
Intellectual Property and Copyrights25
Confidential Company Information26
Breaches of Code26
Company’s Right to Amend The Policy26
Acknowledgement26

Employee Signatures / Initials

Preface

This Code applies to **Quintillion Media Private Limited** and its editorial team in all print and digital media platforms. The Company is committed to the highest editorial and ethical standards. To this end, the Code applies to all our content, whether it is made by the Company, its employees, freelancers, part-time associates and retainers, consultants or by an independent company working for the Company (collectively “**Team Members**”) and whether it is made for radio, television, online, audio, mobile devices, interactive services, print or any other media.

All Team Members have a duty to maintain the highest professional standards. This Code sets the benchmark for those ethical standards, protecting both the rights of the individual and the public's right to know. It is the cornerstone of the system of self-regulation to which the Company has made a binding commitment. It is essential that this Code be honoured not only to the letter but in the full spirit. It should not be interpreted so narrowly as to compromise its commitment to respect the rights of the individual, nor so broadly that it constitutes an unnecessary interference with freedom of expression or prevents publication in the public interest. It is the responsibility of the Team Members to apply the Code to editorial material in both printed, online versions of publications.

As an organization, we are committed to uphold the basic principles of journalism – working with high standards of integrity without any bias or prejudice and winning the trust of our readers. This Editorial Code of Conduct states the standards of behavior that are expected from the Team Members while discharging their professional obligations. This Code lays down guidelines in all the areas where the Team Members need to make personal and ethical decisions in their day to day work.

This Code is to be read in conjunction with other terms and conditions as laid down in the employment agreement or service contract of the Team Members.

General Rules of the Game!

This section deals with standards and rules that the Team Members are expected to follow while discharging their day to day duties. It also provides, in general, a broad framework within which the Team Members must work to ensure integrity of journalism as a profession.

Access to Information

The Team Members are prohibited to make any deal (monetary or otherwise) with anyone in exchange of information or gaining access to information. Team members should also refrain from giving false commitments (on coverage, style of reporting, placement of the news etc) to the clients. They may, however, discuss general information about the story and various ideas necessary for an assignment. As a general principle, payment must not be made for interviews or information. In the event that a demand for payment or other form of reward or compensation is made, agreement must not be given without the Department Head's approval.

Accuracy of Content

The Team Members are expected to use their sound judgment and put all possible efforts to verify the accuracy of content. Some of the broad guidelines that must be adhered to, as far as practically possible, in this context are as follows:

- Accuracy is paramount when either reporting or commenting. It is better to take more time on a story and make sure we have got our facts and any relevant context correct. Always look for a primary source for any assertion you make. For example, if TOI talks about census data, look up the actual census data rather than rely on the secondary source.
- Do not distort audio/video content, quotes or statements. Use them exactly as provided.
- Direct quotations should not be changed, embellished or added to or represented in a way that alters their context or meaning.
- Do not use words like “perhaps”, “arguably”, “may be”, “worst”, “best” etc. which are more “perception” than “fact”. We must use facts for the content than the words which may be perceived as biased or unclear.
- Do not exaggerate (content, information, data etc) while reporting. The content of the story should be backed by thorough research and essential groundwork.
- Do not use innuendos, salacious language or any excessive exaggerations in our headlines or body text which are not justified by the content of the story.
- Do not use expletives and obscene language in our video and text pieces. If directly quoting someone using such language, standard practice is to use symbols such as * and # in place of some letters. However, this policy is subject to context, and certain words may be used with the consent of one of the editors.
- Google Ad guidelines will be shared periodically (ask if you do not have a copy) which should be complied with for sanitization of sexual images, expletives, profanity, hate speech, shaming and so on. We need to comply with these guidelines, but if senior editors agree, content can be published without removing or modifying the offending parts – however you will need to alert Ad Ops Team in advance to ensure they can take action to prevent a Google/YouTube strike.
- Photos, graphics or videos must be used very carefully with an objective of providing information and not scandalizing the issue. Due care should be taken while using such material to ensure that it does not lead to misrepresentation of any kind. Team members should also refrain from doing any alteration (barring minor touch ups) that may be perceived as a deliberate attempt to misrepresent facts. Credit must be given to relevant sources where such information is acquired from outside.
- Team Members must be diligent fact-checkers of all material, either staff-written or extracted from other sources. Never assume that information drawn from other media is accurate, including reader comments to blogs, and information on digital social media platforms. Especially when reporting legal matters, it is advisable to review actual court documents rather than using information from sources or from press releases.
- Facts must be checked on any story that we are curating with a responsible attempt to directly get in touch with the concerned people/parties, mentioned in the story, to check the veracity of the events.

- Facts must be reported impartially, accurately and with integrity and clear distinction must be made between fact, conjecture and comment.
- Try always to tell all sides of the story in any kind of dispute.
- Do not knowingly withhold or suppress essential facts.
- Do not rely on only one source. Be careful not to recycle an error from one reference source to another.
- Direct quotations should not be altered except to delete offensive language, protect against defamation, or to make minor changes for clarity.
- Any story involving sensitive issues such as national security, public safety, sexual violence, religious or caste tensions should be published only after all senior editors have reviewed it. If any of them object to publication, the story must not be published unless they are satisfied that their concerns have been addressed. It is also essential to get any such story legally vetted by external expert counsel or at least by an in-house legal specialist.
- If any member of the newsroom raises a concern regarding publishing a story - then the senior editors should reconsider whether to publish the story and invite comments from everyone in the newsroom for discussion - even if it leads to a delay in publishing the story.
- When putting out any story where we think there is a public interest in publication that overrides any prohibitions (whether legal or otherwise) against publication, we must specify what this public interest is and what purpose our story serves to address it. It is also advisable to get any such justification legally vetted by external expert counsel or at least by an in-house legal specialist.
- Reports of new drugs or medical treatments must be considered with great caution. It is easy to raise false hopes or alarm among readers. Crosscheck all claims with responsible and neutral sources.
- Photographs may be enhanced to improve reproduction but must not be altered in a way which could mislead readers. Care must be taken to ensure accuracy in captions. The editor must approve any alteration or manipulation of a digital photographic image, and the alteration must be explained in the caption before publication and archiving.
- Both online and in print, graphic materials must be prepared with the same care and concern for accuracy, fairness, balance, and attribution as the text component. Copyright ownership and permissions to publish must also be respected. The integration of the graphic and text components, so vital to the overall ability of a publication to present material fully and fairly, must also be done responsibly, to ensure readers' trust.
- We must encourage diversity of opinions and provide space for opposing views but not where such views run contrary to the para below.

- We do not publish any content (including videos or images in stories and also any partner content) which:
 - Shames people because of physical features, or age
 - Indulges in victim-shaming and could reasonably be construed to discourage victims from making complaints or making any statements
 - Promotes or supports hate speech or discrimination on the grounds of religion, caste, gender, sexuality, place of origin or residence
 - Promotes misogyny or objectification of women
 - Is misleading by virtue of not mentioning facts that run contrary to the narrative espoused
 - Can put the health and safety of any person at risk
 - Endorses any medical or alternative medical practice that has not been certified by the Indian Medical Association
 - Trivializes or can reasonably be construed as trivializing casteism, racism, sexism, sexual harassment
- Editorial material will be kept clearly distinct from advertising or any paid-for content.

Content Credits

In case where the content (information or data) is sourced from any outside individual or company, the credit should be given to the respective entity. This rule applies to any kind of content – digital (audio/video) or print. Team Members are, however, advised to make all possible efforts to cross check the accuracy of such content rather than relying on it blindly.

Corrections & Clarifications

To err is after all human! Own up to any error quickly and completely. Be transparent when correcting a factual error. Therefore, as a professional organization, while our endeavour is to work with utmost flawlessness and accuracy, we are also mindful of the fact that mistakes need to be corrected promptly. **Corrections, clarifications, and retractions should be noted online and printed in the next available issue, in a regular, consistent space that is easy for the reader to find in the front of the publication or, in the case of a Web site, the home page.** Serious factual errors should be admitted and corrected at the first opportunity, subject to legal advice where appropriate. No Team Member is allowed to commit the Company to an admission of error, correction, or apology without reference to the Department Head. The Department Head along with the Company lawyers must be consulted about the wording of corrections and clarifications to determine their suitability.

It is our policy to correct significant errors as soon as possible. Any amendment should be notified at the bottom of an article. If a retraction is necessary, this should be accompanied by an explanation as to why this was felt to be necessary, subject to the approval and discretion of the Editor-in-Chief and senior editors.

Privacy

All individuals, including public figures, have a right to privacy. Journalists have no general right to report the private behaviour of public figures unless public interest issues arise. Towards this end, do not identify the family or friends of people accused of, or convicted of, a crime and do not make

pejorative reference to a person's race, nationality, colour, religion, marital status, sex, sexual preferences, age, or physical or mental capacity, taxation details, family court records and health and welfare or matters may be prohibited by legislation.

We should respect the privacy of victims and their families, and not seek to get responses or take images without their consent. We should also not make gratuitous use of deaths or other tragedies, and not publish photos or images of deceased or seriously injured persons unless necessary.

We must take all steps to avoid intruding on any person's privacy in the course of our reporting, and if we do, this must be justifiable, proportionate, with the approval of a senior editor and not a speculative fishing expedition.

We must make all attempts not to directly or indirectly disclose personal information of any person without their consent or compelling public interest, such as phone numbers, email addresses or residential addresses.

Secret Recording

The Quint will use secret recording (video recording/photographing/audio recording or use of spy/hidden cameras) only for the following reasons:

- Only if a clear public interest justifies it, after approval from senior editors.
- As an investigative tool where the recording is necessary to prove the behaviour & is in public interest to reveal & that there is no viable, alternative means of gathering the evidence that proves the behaviour.
- Secret recording may be used as a method of consumer or social research in the public interest, where no other methods could capture the attitudes or behaviour in question.
- No method to be used that amounts to entrapment of concerned people/parties.
- Where possible, consent should be obtained from individuals/organisations & identities of those recorded (video + audio) should be appropriately obscured.
- The gathering and broadcast of secretly recorded material should be a two-stage process - Requiring an explanation for any intrusion at each stage. So, the decision to gather is always taken separately from the decision to broadcast.
- A record must be kept of the approval process, even if the request is turned down or the material gathered isn't broadcast. The reporter is responsible for maintaining its own secret recording records to enable *The Quint* to monitor and review its use across all output.
- The re-use of any secretly recorded material must be referred before broadcast to the senior editor. A record of the decision must be maintained.
- No secret recordings made by outside sources will be used by *The Quint*.

Information Sources (Anonymous)

Following broad guidelines are to be followed by all Team Members while dealing with sources who want to be "anonymous":

- We do not publish stories based on a single anonymous source unless the senior editors are convinced that the source is credible, there appears to be a relevant degree of corroboration from the facts and circumstances and that it is in the public interest to

publish the story. Standard practice is to ensure that you use multiple sources to fact-check any statements.

- In most situations, the Editor-in-Chief, Executive Editor, Sr. Editor-Research or two Sr. News Editors must approve anonymously sourced reporting.
- Team Members must ensure that an unnamed source should have a compelling reason for insisting on anonymity, such as fear of retaliation. They must state those reasons when they are relevant.
- The sources of information must be identified, wherever possible. When an informant insists on anonymity, verification of the information offered must be sought from other, preferably attributable, sources.
- Team members must consult their Department Heads before entering into an agreement or promise to protect a source's anonymity.
- Team members must keep their promises to a source except under the most extraordinary circumstances or as may be required by law, courts or regulatory authorities (where, say, for example, a source acts in bad faith).
- Team members must avoid publishing any pejorative anonymous quotes in stories. In general, anonymous quotes must be used sparingly and only where their inclusion adds something essential to the story.

[Flagging Problematic Content for All Quintees](#)

Ensure that you review any story you have produced, published or edited within the framework of the above guidelines. Please also keep these guidelines in mind as much as possible when pitching, planning or otherwise working on a story. Even if you realize there is an issue after a story has been published, do not hesitate to bring it up with your editor, any other editor, the senior editors or any other member of the organization who you think will know what to do about it.

Please keep the above guidelines in mind when reading content on The Quint's website which has not been prepared by you and flag any content that you think falls foul of these guidelines. Please report anything you find problematic to the senior editors, or any other member of the organization who you think will know what to do about it.

[Professional Conduct](#)

As brand ambassadors of the Company, the Team Members are expected to demonstrate the highest degree of professional conduct both on and off the field. They should always adhere to the integrity of their profession as well as the values and editorial principles of the Company.

While dealing with outsiders, Team Members should always identify themselves correctly. They should always deal with people with utmost dignity and politeness. Team members should also ensure that they do not use their professional pedigree to their personal advantage and gain any personal benefits of whatsoever nature.

Reporting

We must comply with all relevant laws, including those elaborated in more detail in the section on legal compliance below (dealing with victims of rape and sexual offences, crimes against and by children, national security and defamation).

While reporting other criminal/civil cases, team members must not identify “suspects” unless they are charged or convicted. Broadly speaking, we must be aware of the relevant applicable laws and adhere to the same completely.

If a story is likely to put at risk any individual or group of people, we need to take all necessary measures to conceal the identity of such persons. Publication of any such story should also be subject to consultation about the likely impact among senior editors as well as the full Editorial Team. It is also advisable to get any such story legally vetted by external expert counsel or at least by an in-house legal specialist.

In any way, a story that causes a question or alleges any misconduct/criminal activity, every attempt should be made to give the accused person/parties the right to reply.

When raising accusations against someone, it is essential to at least seek a response from them via email, and they should be given a reasonable time – no lesser than 12 hours – to provide such response. The email (and response, if received) should be part of the published story

When exposing the wrong doing of others, we should be above reproach. The greater the story’s impact, the greater our obligation to withstand the most exacting scrutiny. The Quint’s journalists do not break the law to gather news and, no matter what the law permits, aren’t deceptive, duplicitous, or dishonest.

For the purposes of reporting, do not harass or try to intimidate people when seeking information or photographs. Do not photograph people on their property without their consent unless the public interest in doing so is clear.

Do not persist in telephoning, pursuing, questioning, door-stopping or obstructing access after you have been asked by an authorised person to stop.

Reporters and photographers must always behave with sensitivity and courtesy toward the public, and in particular towards those involved in tragic events.

Do not go into non-public areas of hospitals, welfare institutions, funeral parlours, churches, etc., without identifying yourself or without permission of the people affected or their intermediaries.

Extreme care should be taken that children are not prompted in interviews or offered inducements to cooperate. Children must not be interviewed about their parents or siblings unless a parent or other legally responsible adult is present and has granted permission.

Do not report threats to use bombs or other weapons or threats of extortion unless public safety justifies it, or when the authorities request you to do so, or when it is necessary to explain severe and obvious public disruption caused by the authorities’ reaction to such a threat.

Plagiarism/Copyright

We have a zero-tolerance policy against plagiarism. Always make sure you attribute any relevant quotes or findings when doing a story. As we often build on and perform follow-ups to news stories from other investigative media, we must ensure that we note where such content is quoted or curated, and not write such stories in a way that directly or indirectly fails to attribute the correct source.

What Constitutes Plagiarism

- Repeating verbatim (or with minor modifications) any statement without attributing the source.
- Repeating the same sequence of words such that seven consecutive words are exactly the same.
- Copy-pasting content from any other website, document, or other media source.
- Substantially repeating comment or opinion (not fact or basic analysis) from your own content as published elsewhere.

Plagiarism by Members of the Organisation

In the event that any content prepared by a member of The Quint's staff appears to be plagiarized (whether this is noted by a member of the organization or a reader), the following steps will be taken:

1. The relevant editor will be informed and will need ascertain if the content has actually been plagiarized. The senior editors may also ask any other member of the organization to perform the assessment.
2. The story will be taken down or, if possible, edited to remove the plagiarized content.
3. The editor for the relevant story will be asked to explain why they didn't detect the plagiarism, and what steps can be taken to prevent a similar incident from occurring again.
4. The author will be given a hearing by the senior editors to explain why they plagiarized the content. If the plagiarism was a result of a genuine mistake, there will be no further action, though they will be required to take additional care and their editors will need to exercise additional care in reviewing their content for an appropriate period of time.
5. If the plagiarism was not reasonably justified, then this will constitute misconduct and senior editors will decide on a course of corrective action which may include removal from position or a probation period.

Working Guide to What Constitutes Public Interest

Even if publication is likely to result in criticism by the government, on social media, or in litigation because of violation of the law, it may still be justified if there is a strong public interest in publication. The following points need to be kept in mind

- The public interest includes, but is not confined to:
 - i) Detecting or exposing crime or serious impropriety

- ii) Protecting public health and safety
 - iii) Preventing the public from being misled by an action or statement of an individual or organisation.
- There is a public interest in freedom of expression itself, though this must be construed in light of Article 19(2) of the Constitution of India and the reasonable restrictions it envisages. This requires a consideration of all relevant legal issues, and requires consultation with an external lawyer preferably, or at least with an in-house legal specialist.
 - Whenever the public interest is invoked, the editors will need to demonstrate fully that they reasonably believed that publication, or journalistic activity undertaken with a view to publication, would be in the public interest, and what exactly that public interest is.
 - If some material is already in the public domain, this would indicate that comment or further reporting on it is prima facie in the public interest, subject to any relevant prohibitions under law (such as identification of a minor victim under POCSO).
 - In cases involving minors, editors must demonstrate an exceptional public interest to override the normally paramount interest of the child in not being named, or their pictures shown, etc.

Potential Harm to Subject of Coverage

- You need to consider if the content of any article or video COULD POTENTIALLY LEAD TO ANY SORT OF PHYSICAL OR MENTAL HARM to the subject or someone referred to in the story (even if the possibility is remote)
- If you think there is any such possibility, this content needs to be flagged with not only your editor, but the senior editors as well.
- The treatment of any such content will need to be finalised in consultation with the senior editors. This includes not only the way in which the story is done but also how to share it (whether on social media, newsletter, QWrap, etc), BEFORE it reaches final approval stage.
- Examples of issues which will need this extra care include
 - sexual violence,
 - child abuse,
 - revelations about the workings of government or armed forces,
 - any content dealing with conservative or religious groups.

Legal Compliance

1. VICTIMS OF RAPE

Relevant Laws

- Indian Penal Code 1860 ("IPC")
 - **Relevant Provision(s):** section 228A
 - **What does this say?**
 - (1) You cannot print or publish the name or any other detail which may make known the identity of any person against whom an offence of rape, gang rape or custodial rape has been alleged or found to have been committed.

- (2) You can identify the victim/survivor only if the police officer in charge of the investigation authorizes doing so for the benefit of the investigation; if the victim/survivor authorizes you to; or if the victim is dead, a minor or of unsound mind, if authorization from their family has been given to a recognized welfare institution or organization.
- (3) You cannot print or publish any details about a court case which could be used to identify the victim/survivor of rape, gang rape or custodial rape unless the court authorizes you to (also falls foul of section 327 of the Code of Criminal Procedure 1973).

- **What does this mean?**

In any case involving reporting about rape, make sure you use an alternative name for the victim, regardless of the victim's age, and avoid using identifying factors including the names of the victim's family. This requirement can be waived by the victim or the family, but unless it is, leave no indication of the victim's identity in the body of a story, the headline, the URL or any image used in your story.

- **Example of Case Where This Applied:**

The Nirbhaya case. The victim's real name, Jyoti Singh, could not be used in media coverage of the incident even though she was a major. Even after the parents said they were ok with her real name being used, news organisations still needed to be careful because they hadn't given the authorization to a recognized welfare institution or organization, as provided for in section 228A(2) of the IPC.

2. CRIMES INVOLVING CHILDREN

Relevant Laws:

- **Protection of Children from Sexual Offences Act 2012 ("POCSO")**

- **Relevant Provision(s):** section 23

- **What does this say?**

- (1) Make sure you have complete and authentic information about any case involving a child before publishing anything about the story.
- (2) You cannot disclose any details whatsoever that can be used to identify a child - name, address, photograph, family details, school, neighbourhood or anything else.

- **What does this mean?**

In any case involving potential child sexual abuse, make sure you anonymise your story to ensure that no details about the child are mentioned, no matter how innocuous they seem. Noting the age and the state/city in which they are located may be acceptable as these are still broad enough to not make identification easy. **This requirement under law cannot be waived, even by the victim or their family.**

- **Example of case where this applied:**
The Zaira Wasim molestation incident. Even though Zaira herself posted the information about the incident on the airplane, the press should not have mentioned her name, because there are no exceptions to the legal provisions. This was why news organisations, including us, had to change the headlines and body text about the issue – though unlike us, many kept the name in their URLs for SEO purposes which is extremely unethical, and should be avoided.
- Juvenile Justice (Care and Protection of Children) Act 2015 (“JJ Act”)
 - **Relevant Provision(s):** section 74
 - **What does this say?**
You cannot use the photograph, name, address, school or any other detail that can be used to identify a juvenile offender (“child in conflict with the law”), or a vulnerable child, or a child victim or child witness.
 - **What does this mean?**
Even where you’re reporting on a case or police investigation, you have to anonymise your story to ensure that no identifying factors remain, for child victims of crimes, as well as children who’ve committed crimes. Disclosure can be allowed by the Juvenile Justice Board or the Committee under the JJ Act, if they feel this is in the best interests of the child (presumably only for victims, if the perpetrator still needs to be found)
 - **Example of case where this applied**
The Ryan School Gurgaon Case. This was another case where the media coverage broke the law since it identified the victim, Pradyumn Thakur. Fortunately, the name of the Class 11 student identified by the CBI as the suspect, was not revealed. Eventually, the Gurgaon court specified names for the suspect, victim and school.

3. NATIONAL SECURITY

Relevant Laws

- Official Secrets Act 1923 (“OSA”)
 - **Relevant Provision(s):** section 5
 - **What does this say?**
You cannot publish (willfully communicate) any secret official code, password, sketch, plan, model, article, note, document or information which
 - (1) relates to a prohibited place (like an army base); or
 - (2) is likely to directly or indirectly assist an enemy of India; or
 - (3) if disclosed, is likely to affect the sovereignty and integrity or security of India, or our friendly relations with foreign States; or
 - (4) has been obtained after spying on a prohibited place.

- **What does this mean?**
You cannot publish any confidential information which could conceivably help a foreign power, a terrorist organization, or affect relations with other countries (for instance by reporting that India has conducted illegal operations in a foreign country). There are no exceptions to this offence, but this should not prevent the reporting of something which is genuinely in the public interest – for instance where a government stance is leading to negative consequences for the public, like going to war.
- **Example of case where this applied:**
Tentatively, this applies to the publication of the story on Kulbhushan Jadhav. Despite demonstrating lapses in the Indian intelligence framework, it was also information which justified Pakistan’s longstanding position on Jadhav’s status and contradicted India’s stated position, which could have had negative consequences at the International Court of Justice.
A more concrete (though no doubt controversial) example was when NDTV was censured for its coverage of anti-terror operations which could have helped the militants escape or target Indian forces.

DEFAMATION

Relevant Law

- **IPC**
 - **Relevant Section(s):** section 499 (definition and exceptions) + section 500 (punishment) + section 501 (printing defamatory material not necessarily written by you)
 - **What does this say?**
 - (1) You defame someone if you say or write something which is published, with the intention of harming that person’s reputation (or where you had reason to believe would harm that person’s reputation).
 - (2) Statements about a dead person can also be defamatory, if the imputation would harm them had they been living and is intended to be hurtful to the feelings of their family.
 - (3) Defamation can be claimed by a company, association or collection of persons.
 - (4) Using irony or saying this as alternatives, can still be defamation.
 - (5) The courts will look to see if there is an actual harm to a person’s reputation – which requires that the defamatory statement directly or indirectly lowers the reputation of the person.
 - (6) This is subject to several exceptions.
 - **What are the relevant exceptions to defamation?**
 - (2) Truth, provided the publication of the statement is for the public good. This means that there has to be some public interest in publishing a story – without that, truth is not a complete defence.

- (3) Expressing opinions in good faith about the public conduct of public servants.
- (4) Expressing opinions in good faith about the conduct of any person touching any public question. Thus, if someone has either openly got involved in a public question, or whose conduct relates to the public good, you can express an opinion about this.
- (5) Reporting on the proceedings of a court, and any judgment/order of a court. It doesn't matter if the report affects the reputation of the accused, this will still not be defamation.
- (6) Expressing opinions in good faith about the merits of a court case, and the conduct of the parties or witnesses in them.
- (7) Expressing opinions in good faith about the merits of a public performance. This means you can criticize a movie or a character without fear of being hauled up for defamation.
- (8) A statement about the character of another person where it is made in good faith for the protection of your interests or the public good.

○ **What does this mean?**

Don't make derogatory statements about someone except where these are opinions based on good faith, or, where statements of fact, you think there is a genuinely good reason to bring them to light. This does not mean that you should avoid doing a story which brings to light some important issue, but that you should ensure that you are able to claim one of the exceptions if the subject takes exception. It should also act as a spur to ensure greater accuracy in reporting, and care when it comes to how you word your reports. Avoid sensationalism, or gossip, or unfounded speculation.

○ **Example where this was applied:**

The EPW article on the Adanis influencing SEZ and customs refunds law. The article in question made a number of leaps of logic, misrepresented what was said in the Gujarat High Court, and wrongly reported changes to the law. Fortunately, the court agreed to a compromise whereby these offending paragraphs were removed and didn't find the authors and publishers guilty of defamation as a result. The Adanis appear to have cooperated in letting the case go, but this is a rarity when corporates are trying to engage in SLAPP lawsuits to silence critics.

Someone who doesn't seem willing to compromise is Jay Shah, who has filed civil and criminal defamation cases against The Wire even though the article in question refers mostly to publicly available facts. If the article has still been written carefully and without any exaggeration or embellishment, however, once can successfully contest these kind of cases, and can even get them quashed (if criminal).

Social Media & Blogs

This Code is intended to help Team Members make appropriate decisions about the use of social media such as blogs, wikis, social networking websites, podcasts, forums, message boards, or comments on web-articles, such as Twitter, Facebook, and LinkedIn.

All Team Members are expected to comply with this Code at all times to protect the privacy, confidentiality, and interests of our Company and our services, employees, partners, customers, and competitors.

Using work-related social media

We recognise the importance of the internet in shaping public thinking about our Company and our services, employees, partners and customers. We also recognise the importance of Team Members joining in and helping shape industry conversation and direction through interaction in social media. All Team Members are permitted to freely interact on and contribute to the Company blog on various professional and work-related aspects and professional content. In the event any Team Member uses the company platform, then it is the obligation of such Team Member to conduct the interaction and discussions in a manner that is consistent with our Company values and adequate care should be taken to avoid subjects/ areas that are likely to be controversial or personal.

Personal use of social media sites

We permit the use of social media websites for personal use and content subject to prior written approval of the Department Head. All personal blogging or social media interactions of the Team Members are strictly subject to the below mentioned conditions:

- Do not put up any content that the Company would not be prepared to put on any of its platforms.
- No Team Member will express in the social media a view point contrary to the stance taken by the Company.
- The personal blogs of Team Members shall not contain postings about the Company's business, products, employees, customers, partners, or competitors or upload any images or videos of Team Member's participation in any video related to Company's business, products, employees, customers, partners, or competitors, whether Team Member creates a video to post or link to on his/her blog, or contributes content for a video, or appears in a video created either by another employee or by a third party.
- Wherever any "professional content" is posted/tweeted/shared it can **ONLY** be content that has appeared on the Company platform and is therefore Company owned/controlled. No other view/comment/sharing/discussion should be permitted on any social media site, other than what has already been published on an authorized Company platform, or has been authorized by the Company for publication on a third party platform provided the content is clearly linked to the Company.
- Avoid flame wars, incendiary rhetoric and loose talk and refrain from declaring views or taking positions on contentious public or political issues in any public forum or discussing inflammatory topics including without limitation, politics or religion.
- Avoid all vulgar or overtly opinionated comment and refrain from reacting in the heat of the moment;

- If you have created a story or supervised the creation of the same, you have a special duty to be even-handed in your posts and not create or aggressively comment on any post which directly or indirectly alludes to the subject matter or content of your work.
- Do not include political affiliations in your profiles and do not make any postings that express political views. Do not engage in political advocacy – as members of a campaign or an organization specifically concerned with political change.
- Do not interact with newsmakers on their public pages – for instance, commenting on their posts.
- Be mindful of competitive and corporate issues as you post links. And while we may compete vigorously with other news organizations, you should think twice before you tweet or post anything that disparages them.
- Do not post on social networks any information that could jeopardize the safety of journalists — for example, the exact location of journalists reporting from a place where journalists may be kidnapped or attacked.
- If you wish to share your work on personal websites and blogs, you may post a sampling of the text stories, photos, videos or interactives once they have been published by the Company. The material must be clearly identified as Company content and you should link to the content rather than uploading it directly.
- Team members’ social media activities are subject to the same policies and procedures as their other workplace activities. So, for example, if it is inappropriate to engage in sexual harassment while at work, then it is equally inappropriate to do so through the context of social media.
- Unless Team Members have specific written permission to speak on behalf of the Company, it must be clearly indicated that all postings on social media platforms represent their personal opinion and not that of the Company.
- If a Team Member comes across a negative, disparaging, or otherwise concerning post about the Company, its products, services, or clients, it is his / her responsibility to intimate his reporting manager / HR team / designated person in the company. Team members should not respond to any such post without specific written permission.
- Authentication is essential: Verify sourcing after collecting information online. When transmitting information online – as in re-Tweeting material from other sources – apply the same standards and level of caution Team Member would in more formal publication.
- Do not use your positions to promote personal agendas or causes. Nor should Team Members allow outside activities to undermine the impartiality of the Company coverage, in fact or appearance.

- Do not upload, post, forward or post a link to any abusive, obscene, discriminatory, harassing, derogatory, defamatory false, misleading, libellous or criminal content or any content which may cause embarrassment to the Company, our clients or our staff; Make sure to respect others' privacy.
- The Company also prohibits language that is defamatory, harassing, disparaging, or violates obscenity laws.
- Any Team Member who feels that they have been harassed or bullied, or are offended by material posted or uploaded by a colleague onto a social media website should inform the Department Head.
- Never disclose commercially sensitive, anti-competitive, private or confidential information. If you are unsure whether the information you wish to share falls within one of these categories, you should discuss this with the Department Head.
- Do not upload, post or forward any content belonging to a third party unless you have that third party's consent. Before you include a link to a third party website, check that any terms and conditions of that website permit you to link to it. All links must be done so that it is clear to the user that they have moved to the third party's website. Third party Web sites and blogs that you link to must meet our standards of propriety.
- Be honest and open, but be mindful of the impact your contribution might make to people's perceptions of us as a Company. If you make a mistake in a contribution, be prompt in admitting and correcting it. You are personally responsible for content you publish into social media tools – be aware that what you publish will be public for many years.
- Even if you use privacy tools (determining who can view your page or profile, for instance), assume that everything you write, exchange or receive on a social media site is public.
- Be aware of perceptions. If you “friend” a source or join a group on one side of a debate, do so with the other side as well. Also understand that readers may view your participation in a group as your acceptance of its views; be clear that you're looking for story ideas or simply collecting information. Consider that you may be an observer of online content without actively participating.
- Be aware of inadvertent disclosures or the perception of disclosures. For example, consider that “friending” a professional contact may publicly identify that person as one of your sources.

RESPONSE TO CONTROVERSIES INVOLVING CONTRIBUTORS

In the event that an external contributor conducts themselves in a manner not befitting The Quint's standards of conduct, including engaging in online harassment, inciting violence, hate-mongering (including wishing the death of public figures), they will be blacklisted on our database. This will lead to a termination of their relationship with The Quint and we will not ask them to write for us again. In the event the controversial behavior is not too serious and the person makes an apology, they may be asked to write for us in the future, if the Editor-in-Chief so decides.

The senior editors will review the circumstances and decide an appropriate additional response, depending on the nature of the controversial conduct (keeping in mind public interest and the right to freedom of expression as reasonably restricted). These may include:

- Issuing a public disavowal of only the controversial conduct, not the author themselves. For example: "The Quint does not condone the views expressed by X. The Quint is an open platform, and assumes no responsibility for statements made by its affiliated writers in their personal capacities."
- Issuing a public disavowal of the controversial conduct and the author.
- Addition of an additional disclaimer as described above at the beginning of any previously published articles.
- Removal of all previously published articles. (**Note:** this should only be an option of last resort, where the conduct is particularly grave and egregious, and should ideally be only done if there is unanimous consensus by the senior editors).

Plagiarism by External Contributors

In the event that any content prepared by an external contributor appears to be plagiarized (whether this is noted by a member of the organization or a reader), the following steps will be taken:

1. The relevant editor will be informed and will need ascertain if the content has actually been plagiarized. The senior editors may also ask any other member of the organization to perform the assessment.
2. The story will be taken down or, if possible, edited to remove the plagiarized content.
3. The editor for the relevant story will be asked to explain why they didn't detect the plagiarism, and what steps can be taken to prevent a similar incident from occurring again.
4. The author will be asked to explain why they plagiarized the content. If the plagiarism was a result of a genuine mistake, they will be asked to take additional care in making sure this doesn't happen again. The incident should be recorded in the database of contributing authors.
5. If the plagiarism was not reasonably justified, then the author will be blacklisted and we will not approach them for contributions again. Previous contributions (if any) by the contributor will need to be reviewed for plagiarism, and if necessary, taken down or modified. After consulting the agreed terms and conditions, payment for the contribution may be withheld.

Editorial Guidelines and Standard operating procedures for Video content

SENSITIVE SUBJECTS

- Do not show faces of kids whenever it's a story like abuse, child labour, AIDS etc.
- Do not show faces of survivors of sexual abuse, rape, whistle blowers.
- Do not show any visual that gives away the location, address in the above cases
- Do not show videos of extreme violence, blood, accident victims
- In all the above scenarios please BLUR THE FOOTAGE, MODIFY THE AUDIO, REMOVE ANY OTHER IDENTIFYING FACTORS.
- Where ever blood and gore or extreme violence is being depicted, put a disclaimer / warning right at the beginning of the video

CONSENT

- When taking any video of a person, you need to get the CLEAR, UNEQUIVOCAL and INFORMED CONSENT of the subject, to record the video AND to publish it. If the content deals with a sensitive political or social issue, explain what you're doing and what steps will be taken to protect their identity if they desire (or is required).
- There must be a compelling public interest in not obtaining the person's consent. As a practice, WE DO NOT USE HIDDEN CAMERAS OR SECRETLY RECORD anything unless there is a huge issue of public interest. Any decision to make any such recording needs to be approved by all senior editors.
- If the subject is a minor, you MUST take the consent of their PARENT or GUARDIAN before taking any videos. If there is some public interest in getting their story without the consent of the parent or guardian (for instance in case of abuse or mistreatment by the parent/guardian), then such content will need to be anonymized in every way possible. You must ensure you check the final version of the video or story you put out to ensure that the faces of the children are blurred, their voice is distorted, their name is changed, any other identifying details and location obscured.

STANDARD OPERATING PROCEDURES

1. Approvals and Treatment

- Every video, no matter how many edits it has been through, MUST be approved by senior editors before being published in any manner whatsoever. For matters involving the Prime Minister, President, Amit Shah, Rahul Gandhi, or any other person whose political or social status is sensitive (for eg BR Ambedkar), the Editor-in-Chief's approval is also required.
- Where a video deals with sensitive subjects, you must get the treatment of the video (including post-publication) confirmed before reaching the final approval stage. This is to be done in consultation with the senior editors, but also consult any other editors

or field specialists (such as Aviral for politics, Urmi for gender or Vakasha for legal) in case you think you need some additional advice.

2. Avoiding Copyright and Other Intellectual Property Claims

In our videos, if we are using footage that belongs to other individual, organization, media house.

- Seek permission on mail from original source.
- Use less than 10 seconds of footage
- Put credit as footage courtesy as text on the video through the length of the footage.
- Acknowledge credit in the text piece.
- Turn of monetization option on YouTube. (There's no guarantee still that we won't get a strike)
- As far as possible avoid posting the video on YouTube. Post in on native player, FB, twitter (Even on FB we can get a strike, another digital publication which got a notice from British Pathe)

(NB: EVEN AFTER TAKING ALL THE STEPS, THERE IS STILL NO GUARANTEE THAT WE WON'T GET A STRIKE.

- BEST IS TO AVOID USING VIDEO FOOTAGE WHICH DOESN'T BELONG TO US.

- AVOID USING FOOTAGE BELONGING TO YASHRAJ FILMS, T-SERIES ON ANY PLATFORM.)

3. If we are using any exclusive (rare) footage / photos that belongs to us.

- Please prominently watermark the video / photo with a translucent 'The Quint' scroll right in the middle of the video. This will avoid anyone from stealing our video and trying to get rid of the logo by resizing or cropping the video.

4. For YouTube uploads

- Always add annotations and cards in all stories uploaded on YouTube.
- Add Thumbnails in the correct format on all uploaded videos.
- Add proper tags as its help ranking and discoverability of videos.
- Give proper music or video credits in description of videos. Do this even if we are using music and footage for which we have usage permission like BBF Music / ANI. Here's a sample:

“Video: ANI

Music: Big Bang Fuzz”

5. Archiving

- It is the reporter's / producer's job to ensure the mix / unmix videos and IMPORTANT / GOOD RAW FOOTAGE is archived in the emam.
- Send the path of the mix / unmix / raw footage to the ingest team
- Send proper tags (e.g. Narendra Modi / Madhya Pradesh Tourism / Good Sunset shots / Good Delhi Shots) to the ingest team. Proper tags will help in faster and efficient search.

Affiliations & Associations

Team Members must use their sound judgment while associating themselves with outside organizations. They must take prior written approval from their respective Department Heads in advance or report promptly at the time of joining in case of existing affiliations or associations that may potentially be perceived to be damaging to the Company's reputation and credibility and may create any conflict of interest. (for example, if you are covering Gadgets, it may be inappropriate for you to join Mobile Operators' Association. Similarly, it may be inappropriate for a business journalist to join any trade association).

Before joining any association, team members must get themselves fully aware of the business objectives, funding sources, operational framework, public standing etc. of the organization they are or intend to get associated with so as to ensure that their association should not be detrimental to the goodwill of Quintillion and they should promptly give up the association if directed to.

Awards, Gift & Freebies

Team Members or the member of his/her immediate family (consisting of spouse, parents, parent in laws, children and siblings) must not request or accept any money, travel, goods, discounts, entertainment or inducements awards, recognitions or felicitations of any kind outside the normal scope of business hospitality or from the Companies or Groups covered by us or our advertisers and the like. Similarly, no Team Member is allowed to give or receive gifts of whatsoever nature to/from any individual or Company (including existing or potential news sources). In exceptional circumstances where not accepting / giving gift of nominal value may be considered offensive, team members must get a written permission from their Department Heads.

Team members should also refrain from taking any freebies from professional associates. The freebies can be in the form of meals, lodging & boarding, transportation, tickets of events, concerts or movies etc.

Bribes are to be rejected promptly and the editor informed immediately.

Business & Financial Dealings and Reporting

Team members are prohibited from entering into any kind of business or financial relationships with their sources or professional associates. Moreover, they shall be prohibited from covering individuals or institutions with which they have a business or financial relationship.

Team members must never allow their personal investments or interests to influence their news decisions. They must refrain from working on stories that could, in any way, result in their own financial gain and must inform their Department Heads immediately in case of any such scenario. In

addition, Team Members should also not use any internal information obtained during the course of their work (which is not in the public domain) to make personal investment decisions.

It is illegal for Team Members to make personal gain from financial information received in advance of general publication. It is illegal to pass this information to others.

Team Members must not write about shares, securities or companies in which they, or their family or friends, have a financial interest without disclosing that interest to the Department Head/editor. A declaration of interest must be made if Team Members have traded or intend to trade, directly or indirectly, in shares or securities about which they have written recently or intend to write soon.

Team Members should not write about prospectuses prior to their lodgement without confirming the applicable laws.

Personal Relationships

Team members are prohibited to conduct business of any kind with a relative by birth, marriage or otherwise. They must realize that activities of their family members may create conflict of interest at times and they should be mindful of using their rational judgment in this regard.

While the Company understands that it has no authority to limit or supervise the activities of the family associates of its team members, it may, however, alter the work profile of team member/s based on the activities of his/her family associates in the best professional interest and without any prejudice to the concerned team member/s.

Political Indifference

Team Members of Quintillion must not be involved directly or indirectly in any kind of political activity like advocating or campaigning for any political party or candidate, public expressions of their personal political preference (like sticking banners in their houses, displaying political stickers or slogans on their vehicles etc).

Team Members are prohibited from contesting or accepting any appointment or association of whatsoever nature with any public office.

Professional Influence

Team Members must not use any kind of direct or implied influence of their association with the Company to gain any personal favors (monetary or otherwise) from any individual or organization.

Public Speaking & Writing

There may be circumstances where a team member may be invited to speak or write his/her views on various public platforms. Team members must take a prior written approval from their respective Department Heads before accepting any such invitation. They are also advised to avoid situations where their appearance or involvement could be perceived as their own endorsement of the interests of the inviting organization. They must also be careful not to express views or give statements which are in contrast with the Company's view on the subject in question.

Team members are advised not to accept any honorarium (monetary or otherwise) in consideration of their appearances on various public platforms.

Applicable Laws

All Team Members must comply with all rules, laws, regulations and codes directly or indirectly applicable to media companies and journalists including without limitation all applicable laws relating to content, ethics, defamation, privacy, discrimination, harassment and copyright.

Reviews

There may be circumstances where Team Members may get items of nominal value (for example Books, CDs, Product Samples etc) for review as part of the story coverage. Such items should be deposited with the Departmental Head promptly. No Team Member should retain such items for personal usage or sell the same for personal monetary gains. The items of significant monetary value must be promptly returned to the respective organizations.

Restriction on Dual Employment

No Team Member shall write, work, or consult for, or otherwise contribute to, competing online or print publications, or publications' companies, except as permitted by established and authorized business relationships of the Company. Team Members should not hold other non-journalist positions that could represent a conflict of interest with their position with the Company. However, subject to prior written approval of the Department Head, the Team Members may pursue some pro bono activities like association with NGOs without any monetary or non-monetary consideration, community work, pursuing personal interests (public debates, appearances on TV or Radio, social networking, blogging etc. on topics which are not related to the work.) if such an association does not amount to any potential conflict of interest with their work. No work of any nature, voluntary or involuntary, for any organisation that is a competition to the Company shall be permitted.

Team Members are not permitted to be associated with individuals or Companies that are professionally associated with us or are regularly covered by us. Team members are, however, advised to report such associations to their respective Department Heads.

Intellectual Property and Copyrights

Intellectual property either related to the individual's employment or consultancy responsibility, or resulting from activities performed by the Team Members during their association with the Company, or with support of the Company or from using any Company facilities is subjected to ownership by the Company. The copyright for all developed work/document/ material/ product shall belong to the Company and shall have a copyright notice in the name of the Company.

Team members contributing any copyrighted materials to the Company shall not retain copyright ownership of the original work and the Company shall hold an exclusive, irrevocable, worldwide, perpetual, royalty-free license of the same.

Upon submission of the work, the Company shall have full control and authority to reproduce, distribute, publish, display, perform, and create derivative works based on the original work.

Confidential Company Information

To maintain the integrity and confidentiality of Quintillion's information, Team Members shall be truthful in reporting information and at all times shall refrain from disclosing confidential information or materials of the Company to unauthorized persons. Confidential information may include information or data about the company's planning, business strategy, projects, existing or potential customers, competitors or suppliers, financial results or operations, major contracts, commencement of major litigation, confidential personnel information and anything else which is not in the public domain. These prohibitions extend to the confidential information of company's suppliers, customers and third parties with whom the company does business.

All confidential information is imparted to the team members of the Company in a relationship of confidence. Each team member, therefore, must exercise a high standard of care with regard to all confidential information. Each Team Member must use the information known to him or her only in the manner authorized by the Company. Outside of their employment or engagement, the Team Members are restricted from using their personal knowledge of Company's clients or personal influence over them.

All Team Members are responsible for protecting the company's confidential information and cannot:

- Disclose that information to third parties without proper authorisation to do so;
- Disclose the information for personal gain; or
- Use the information in any manner that is inconsistent with the company's interests.

If a Team Member has any doubt about whether certain information confidential or not do not disclose such information without first discussing with Department Head. Improper disclosure or use could destroy the value of such information to the company and substantially weaken the company's competitive position. Access to confidential information must be limited to authorized persons with a need to know that particular information.

All Team Members must respect the confidences and sensitivities of your colleagues at all times.

Breaches of Code

Complaints involving alleged breaches of this Code will be investigated by the managing editor or by an executive of equivalent status. Proven breaches will be dealt with in accordance with the company's disciplinary procedures which could include dismissal.

Company's Right to Amend The Policy

The Company reserves the right to amend this document from time to time in its best professional business interest. Any changes will be communicated to all the employees in writing and the employees will stand to be governed by such revised amendments.

Acknowledgement

I hereby accept and agree to all the terms and conditions mentioned in this Policy Document and give my consent to the policies and procedures mentioned herein. I hereby promise to abide by such rules, regulations, policies as mentioned in these documents and as stipulated in this agreement.

Name : _____

Signature : _____

Date : _____