



Employee Handbook

Effective April 1, 2009

Arizona Daily Star

PREFACE

This employee handbook replaces all previous handbooks. The handbook consists of Section A and Section B. Section A contains those policies that are standard for all Lee Enterprises. Section B contains policies that are specific to your location due to local and state requirements. Both Sections are equally important to you as an employee. It is designed to acquaint you with Lee Enterprises and provide you with information about working conditions, employee benefits and some of the policies affecting your employment. It does not, however, create a contract of employment. You should read, understand and comply with all provisions of the handbook. It describes many of your responsibilities as an employee and outlines the programs developed by Lee Enterprises to benefit employees. All employment benefits cease immediately upon termination of employment, unless specifically stated otherwise.

THIS HANDBOOK DOES NOT CREATE A CONTRACT OF EMPLOYMENT. EMPLOYMENT AT LEE ENTERPRISES IS "AT WILL" AND THERE IS NO SPECIFIED LENGTH OF EMPLOYMENT. AS AN AT-WILL EMPLOYEE, EITHER YOU OR LEE ENTERPRISES CAN TERMINATE THE EMPLOYMENT RELATIONSHIP AT WILL, WITH OR WITHOUT CAUSE, WITH OR WITHOUT NOTICE.

No employee handbook can anticipate every circumstance or question about policy. Lee Enterprises reserves the right to revise, supplement, suspend or rescind any policy or policies in the handbook from time to time as it deems appropriate, at its sole and absolute discretion. You will receive notice of any such changes, but you may not receive notice in advance of the change.

To the extent that any provision of this handbook conflicts with any provisions of law, it shall be deemed modified, but only to the extent necessary so that it will comply with the applicable provisions of statutes, state or federal, now in effect or passed in the future.

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WELCOME TO LEE ENTERPRISES!

Lee Enterprises is a premier publisher of local news, information and advertising in primarily midsize markets, with 52 daily newspapers and a joint interest in six others, rapidly growing online sites and more than 300 weekly newspapers and specialty publications in 23 states. Lee's newspapers have circulation of 1.7 million daily and 1.9 million Sunday, reaching more than four million readers daily, and its weekly publications have distribution of more than 4.5 million households.

With the acquisition of Pulitzer Inc. in 2005, Lee became the fourth largest newspaper company in the country in terms of dailies owned, and grew from 12th to seventh largest in terms of total daily circulation.

Lee is based in Davenport, Iowa, and its stock is traded on the New York Stock Exchange under the symbol LEE. We have more than 10,500 employees.

Our company is focused on six key operating priorities:

- Grow revenue creatively and rapidly
- Deliver strong local news and information
- Accelerate our online innovation
- Continue expanding our audiences
- Nurture employee development and achievement
- Exercise careful cost control

Lee was founded in 1890 in Ottumwa, Iowa, by A.W. Lee. Many of our newspapers trace their beginnings to the mid-1800s, and our oldest, in Auburn, N.Y., dates to 1816. Among our alumni are Mark Twain, Willa Cather and Thornton Wilder. A reporter from The Bismarck Tribune died with George Custer at the Battle of the Little Big Horn. Nearly 30 years ago, the Quad-City Times in Davenport, IA, was the first in the world to be produced totally by computer.

The recent addition of Pulitzer Inc. and the St. Louis Post-Dispatch, founded in 1878 by the legendary Joseph Pulitzer, has made Lee the steward, also, of the Pulitzer newspaper legacy.

For more information, history and news about Lee Enterprises, please visit www.lee.net.

WORKPLACE POLICIES AND INFORMATION

HARASSMENT

Lee Enterprises is committed to a work environment that promotes equal employment opportunities and is free from discrimination and harassment. Discrimination on the basis of race, color, religion, sex, age, disability, marital status, national origin, or any other characteristic protected by law is unacceptable and will not be tolerated. Harassment based on race, color, religion, sex, age, disability, marital status, national origin or any other characteristic protected by law constitutes discrimination and is also prohibited by this policy.

Under this policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, sex, national origin, age, disability, marital status, citizenship or any other characteristic protected by law, and that: (a) has the purpose or effect of creating an intimidating, hostile or offensive work environment; or (b) has the purpose or effect of unreasonably interfering with an individual's work performance; or (c) otherwise adversely impacts an individual's employment opportunities.

Harassing conduct includes, but is not limited to, epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes and written or graphic material that denigrates or shows hostility or aversion toward an individual or group and that is placed on walls or elsewhere on the employer's premises or circulated in the workplace.

This policy applies to all applicants and employees, whether related to conduct engaged in by fellow employees or someone not directly connected to Lee Enterprises such as an outside vendor, consultant or customer.

Conduct prohibited by this policy is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

Lee Enterprises encourages reporting of all perceived incidents of harassment or discrimination, regardless of the offender's identity or position. Any employee who believes that he or she is being harassed or discriminated against must promptly take the following steps:

1. Politely, but firmly, confront the offender, explain that the behavior is unwelcome and request that it stop. If you prefer not to address the offender directly, you should proceed to the step outlined below.
2. If the offensive behavior continues or if you are uncomfortable talking to the person directly:
 - Talk to your supervisor, department manager, human resources representative, local operating executive or operating vice president. If you are uncomfortable with speaking to someone at your location, you may call the Lee Open Door Line at 1-877-LEE-4YOU (1-877-533-4968) to request assistance.
 - If you believe that inadequate action is being taken to resolve the complaint after a reasonable length of time, you should discuss the problem with Vito Kuraitis, Vice President of Human Resources (1-563-383-2141).

All complaints will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct

or may have other relevant knowledge. Employees are expected to cooperate fully in any such investigation. A refusal of an employee to cooperate in an investigation shall result in disciplinary action, up to and including termination.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.

Misconduct constituting harassment or retaliation will be dealt with appropriately. Responsive action may include, for example, training, referral to counseling and/or disciplinary action such as warning, reprimand, suspension or termination as Lee Enterprises believes appropriate under the circumstances.

Questions regarding specific situations or this policy should be directed to your supervisor or the Director of Human Resources.

SEXUAL HARASSMENT

Lee Enterprises is committed to a work environment that promotes equal employment opportunities and is free from discrimination and harassment. Sexual harassment constitutes discrimination and is strictly prohibited by Lee Enterprises. For purposes of this policy, sexual harassment is defined, as in The Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when:

- A. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; or
- B. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- C. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Sexual harassment may include a range of subtle and not so subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include, but are not limited to: unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess, or sexual deficiencies; leering, whistling, or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

This policy applies to all applicants and employees, whether related to conduct engaged in by fellow employees or someone not directly connected to Lee Enterprises such as an outside vendor, consultant or customer.

Conduct prohibited by this policy is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

Lee Enterprises encourages reporting of all perceived incidents of sexual harassment, regardless of the offender's identity or position. Any employee who believes that he or she is being sexually harassed must promptly take the following steps:

1. Politely, but firmly, confront the offender, explain that the behavior is unwelcome and request that it stop. If you prefer not to address the offender directly, you should proceed to the step outlined below.
2. If the offensive behavior continues or if you are uncomfortable talking to the person directly:
 - Talk to your supervisor, department manager, enterprise human resources manager, enterprise operating executive or operating vice president.
 - If you are uncomfortable with speaking to someone at your enterprise, you may call the Lee Open Door Line at 1-877-LEE-4YOU (1-877-533-4968) to request assistance.
 - If you believe that inadequate action is being taken to resolve the complaint after a reasonable length of time, you should discuss the problem with Vito Kuraitis, the Vice President of Human Resources (1-563-383-2141).

All complaints will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. Employees are expected to fully cooperate in any such investigation. A refusal of an employee to cooperate in an investigation shall result in disciplinary action, up to and including termination.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Retaliation against an individual for reporting sexual harassment or for participating in an investigation of a claim of sexual harassment is a serious violation of this policy and, like harassment itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.

Misconduct constituting sexual harassment or retaliation will be dealt with appropriately. Responsive action may include, for example, training, referral to counseling and/or disciplinary action such as warning, reprimand, suspension or termination as Lee Enterprises believes appropriate under the circumstances.

Questions regarding specific situations or this policy should be directed to your supervisor or the Director of Human Resources.

CLIMATE SURVEYS

The company conducts periodic "climate surveys" to determine how you feel about policies and practices. This is an important part of our communication program and you are encouraged to participate.

The surveys are designed as tools to measure climate on an ongoing basis, to identify strengths and opportunities for improvement; and, in support of our communication strategy, to provide a process for feedback and response to employees.

CODE OF BUSINESS CONDUCT AND ETHICS

Introduction

This Code of Business Conduct and Ethics covers a wide range of business practices and procedures. It sets out basic principles to guide all employees of the Company. It is supplemented by our Corporate Policies, Guidelines and Procedures, which, collectively, provide a framework for prudent decision-making. All of our employees must conduct themselves in accordance with this Code and seek to avoid even the appearance of improper behavior. In this respect, Lee's tradition is that we will engage in no business or political arrangement that would be embarrassing to us if it were published on the front page of the local paper.

An Enterprise can create a more restrictive policy if the enterprise head believes such a policy would enhance the spirit and intent of this policy.

This Code also should be provided to and followed by the company's agents and representatives, including consultants.

If a law conflicts with a policy in this Code, you must comply with the law; however, if a local custom or policy conflicts with this Code, you must comply with the Code. If you have any questions about these conflicts, you should ask your supervisor how to handle the situation.

Employees who violate the standards in this Code will be subject to disciplinary action. If you are in a situation that you believe may violate or lead to a violation of this Code, follow the guidelines described in Section 11 of this Code.

1. Compliance with Laws, Rules and Regulations

Obedying the law, both in letter and in spirit, is the foundation on which this company's ethical standards are built. All employees must respect and obey the laws of the cities, states and countries in which we operate. Although not all employees are expected to know the details of these laws, it is important to know enough to determine when to seek advice from supervisors, managers or other appropriate personnel. The company holds information and training sessions to promote compliance with laws, rules and regulations, including insider trading laws.

2. Conflicts of Interest

A "conflict of interest" exists when a person's private interest interferes in any way with the interests of the company. A conflict situation can arise when an employee, officer or director takes actions or has interests that may make it difficult to perform company work objectively and effectively. Conflicts of interest also may arise when an employee, officer or director, or family member, receives personal benefits from third parties as a result of his or her position in the company. For example, loans or guarantees of obligations of loans to employees and their family members may create conflicts of interest.

It is almost always a conflict of interest for a company employee to work simultaneously for a competitor, customer or supplier. You are not allowed to work for a competitor as a consultant or board member. Any employee who wishes to perform consulting services of any kind must inform and obtain prior approval from his or her publisher and respective operating vice-president. In no event may an employee perform consulting services for a competitor. Additionally, outside consulting is viewed as a conflict of interest for salaried employees who are expected to devote their professional efforts solely to the company.

The best policy is to avoid any direct or indirect business connection with our customers, suppliers or competitors, except on our behalf.

Acceptance of gifts in a business relationship can also result in a conflict of interest. No gift or entertainment should ever be accepted by any company employee, directly or indirectly through a family member or agent unless it: (1) is not a cash gift, (2) is consistent with customary business practices, (3) is not excessive in value, (4) cannot be construed as a bribe or payoff and (5) does not violate any laws or regulations. Please discuss with your supervisor any gifts or proposed gifts that you are not certain are appropriate. Any gift given or received that is valued in excess of \$100 must be reported to the Vice President of Human Resources.

Conflicts of interest are prohibited as a matter of company policy, except under guidelines approved by the Board of Directors. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with higher levels of management or the company's corporate attorneys. Any employee, officer or director who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor, manager or other appropriate personnel or consult the procedures described in Section 11 of this Code.

3. Insider Trading

Employees who have access to confidential information are not permitted to use or share that information for stock trading purposes or for any other purpose except the conduct of our business. All non-public information about the company should be considered confidential information. To use non-public information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is not only unethical but also illegal. If you have any questions, please consult the company's General Counsel.

4. Corporate Opportunities

Employees, officers and directors are prohibited from taking personal gain through the use of corporate property, information or position without the consent of the Board of Directors. No employee may use corporate property, information or position for improper personal gain, and no employee may compete with the company, directly or indirectly. Employees, officers and directors owe a duty to the company to advance its legitimate interests when the opportunity to do so arises.

5. Competition and Fair Dealing

We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. Each employee should endeavor to respect the rights of and deal fairly with the company's customers, suppliers, competitors and employees. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

To maintain the company's valuable reputation, compliance with our quality processes and safety requirements is essential. In the context of ethics, quality requires that our products and services be designed and produced to meet our obligations to customers. All inspection and testing documents must be handled in accordance with all applicable regulations.

The purpose of business entertainment and gifts in a commercial setting is to create good will and sound working relationships. No gift or entertainment should ever be offered, given, or provided by any

company employee, directly or indirectly through a family member of an employee or agent unless it: (1) is not a cash gift, (2) is consistent with customary business practices, (3) is not excessive in value, (4) cannot be construed as a bribe or payoff and (5) does not violate any laws or regulations. Please discuss with your supervisor any gifts or proposed gifts that you are not certain are appropriate. Any gift given or received that is valued in excess of \$100 must be reported to the Vice President of Human Resources.

6. Payments to Government Personnel

The U.S. Foreign Corrupt Practices Act prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business. It is strictly prohibited to make illegal payments to government officials of any country.

In addition, the U.S. government has a number of laws and regulations regarding business gratuities that may be accepted by U.S. government personnel. The promise, offer or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity in violation of these rules would not only violate company policy but could also be a criminal offense. State and local governments, as well as foreign governments, may have similar rules. The company's Corporate Counsel can provide guidance to you in this area.

7. Record-Keeping

Honest and accurate recording and reporting of information is required of all employees. Records should always be retained or destroyed according to the company's record retention policies. In accordance with those policies, in the event of litigation or governmental investigation please immediately consult the company's Corporate Attorney, Sheri Curran, as set forth in the company's legal policy. Maintain all records related to the matter until after consultation with corporate legal counsel and your operating vice president.

All of the company's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the company's transactions and must conform both to applicable legal requirements and to the company's system of internal controls. Unrecorded or "off the books" funds or assets should not be maintained unless permitted by applicable law or regulation and approved by the company's CFO and Audit Committee.

Business records and communications often become public, and we should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that can be misunderstood. This applies equally to e-mail, internal memos and formal reports.

8. Confidentiality

Employees must maintain the confidentiality of confidential information entrusted to them by the company or its customers, except when disclosure is authorized by the company's General or Corporate Counsel or required by laws or regulations. Confidential information includes all non-public information that might be of use to competitors, or harmful to the company or its customers, if disclosed. It also includes information that suppliers and customers have entrusted to us. The obligation to preserve confidential information continues even after employment ends.

9. Protection and Proper Use of Company Assets

All employees should protect the company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the company's profitability. Any suspected incident of fraud or theft should be immediately reported for investigation. Company equipment should not be used for non-company business, though incidental personal use is permitted.

The obligation of employees to protect the company's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and distribution plans, engineering ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information would violate company policy. It also could be illegal and result in civil or even criminal penalties.

10. Statements to the Public

No public statements may be made as a representative of the company without prior authorization from the Publisher, President and Chief Executive Officer, or Executive Editor.

Any employee who wishes to speak at a public event or submit an article for a publication in a trade magazine or other publication must obtain prior approval from his or her publisher and respective operating vice-president. While we recognize and support your right to engage in legal activities while you are not working, we also must be careful to (1) avoid the employee's position being mistaken for the position of the company, (2) avoid an interpretation that the company in any way endorses the employee's position, and (3) avoid a violation of any other policies of the company, including those related to conflict of interest and confidentiality of company property and information.

11. Waivers of the Code of Business Conduct and Ethics

Any waiver of this Code for executive officers or directors may be made only by the Board or a Board committee and will be promptly disclosed as required by law or New York Stock Exchange rules.

12. Reporting any Illegal or Unethical Behavior

We all must work to ensure prompt and consistent action against violations of this Code. In some situations, however, it is difficult to know right from wrong. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- Discuss the problem with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the issue and will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve problems.
- Seek help from Company resources. In the rare case where it may not be appropriate to discuss an issue with your supervisor, or where you do not feel comfortable approaching your supervisor with your question, discuss it with your Publisher or VP Human Resources. If that alternative also is not appropriate, call 1-877-LEE-4YOU, the company's Open Door Line. If you prefer to write or call directly, you may address your concerns to our VP of Human Resources or our

independent General Counsel's office listed below or to any other officer of the company listed in the Lee Corporate Directory:

Vytenis P. Kuraitis
Vice President – Human Resources
Lee Enterprises, Incorporated
201 N Harrison St., Suite 600
Davenport, IA 52801
(563) 383-2100

C. Dana Waterman, III
General Counsel
Lane & Waterman
220 N Main St., Suite 600
Davenport, IA 52801-1987
(563) 324-3246

- You may report ethical violations in confidence and without fear of retaliation. The company does not permit retaliation of any kind against employees for good faith reports of ethical violations.

COMMUNITY PARTICIPATION

Lee Enterprises has an active interest in, and concern for, the social, financial and cultural issues in the communities we serve. We are active and strive to be a good corporate citizen. Similarly, you are encouraged to be active in your community.

Your activities enrich our perspective and knowledge of the community and strengthen our leadership position. When you are involved in a local event or activity, please share interesting or relevant information with other employees.

You should represent yourself as an individual citizen unless you have been specifically designated as a spokesperson for the company.

Working for a media company carries with it the professional responsibility of fairness and objectivity in the coverage of news. In the widely varying area of opinion, company credibility may be compromised if employees involve the name and identification Lee Enterprises. To avoid possible conflict of interest, you must receive permission from an officer of Lee Enterprises before running for elected office, accepting an appointed political office, or accepting a position on a candidate's campaign staff.

Please use your best judgment when involved in outside activities that will reflect, even indirectly, on Lee Enterprises.

If you have any questions, please ask your supervisor or human resources representative for further information.

CONFLICT OF INTEREST AND OUTSIDE EMPLOYMENT

Employees may hold outside jobs as long as they meet the performance standards of their job at Lee Enterprises and if the outside job is not a conflict of interest. If outside employment is interfering with

your ability to meet the requirements of your job or if it otherwise creates a conflict of interest, you could be asked to make the choice between positions.

Outside employment and other situations that constitute a conflict of interest may result in discipline, up to and including termination of employment. Conflict of interest is any situation that involves possible conflict or the appearance of possible conflict between personal interests and the interests of the company.

While it is not possible to enumerate all situations that might result in a conflict of interest, the following are some examples:

- Use or disclosure to outsiders of confidential information for their personal profit or advantage of any person.
- Acceptance by an employee of gifts of more than token value: Cash, gift certificates, entertainment, or other favors from an outside firm or person.
- Providing managerial, consultative, or any other services to any concern, including serving as a director, officer, or agent without the company's knowledge and consent.
- An employee's direct or indirect ownership of or financial interest in any concern that competes with Lee Enterprises.
- Using company equipment and supplies for personal profit.

All of us need to observe this policy. If you are involved in any situation that may raise questions under this policy, you should discuss it with your supervisor immediately.

DESKTOP AND LAPTOP STANDARDS

Each computer will automatically lock after being idle for 20 minutes. The user of that computer will be able to unlock the computer with a personal network password. This helps prevent unauthorized access to a computer while the owner is away. Exceptions must be approved by the local technical support manager.

As you leave the office for the day, you should log off of your computer. Never leave your computer logged on when you are not in the office, but you should leave your computer turned on.

Once a week, during the night, processes will run that will reboot all PCs in the office. This will allow some automated processes to run as well as scans needed for software license compliance testing.

No computers should have hot bars, screen savers or other software downloaded from the internet unless it is specifically related to business needs. Even though this software may seem harmless, it can actually include spyware that compromises our network integrity. If you already have some of this installed, please remove it. If you need help removing it or help determining if you have spyware installed, please contact your local network administrator.

Network passwords must meet the following criteria:

- Passwords must be at least eight (8) characters long.
- Passwords must be unique and will expire every 60 days.
- The last 10 passwords are remembered and cannot be reused.

- The minimum password age is 2 days.
- Passwords may not contain your user name or any part of your full name.
- Passwords must contain characters from at least three (3) of the following four (4) classes:

Class	Examples
1) English upper case letters	A, B, C, ... Z
2) English lower case letters	a, b, c, ... z
3) Westernized Arabic numerals	0, 1, 2, ... 9
4) Non-alphanumeric special characters	!,@,#,\$,%,&,*

DO NOT CALL POLICY

Lee Enterprises uses the telephone as one important way to stay in contact with our customers and our potential customers in the community. Because a good relationship with the community is a necessary ingredient of our success, and in keeping with state and federal laws, it is the policy of this company that we will not make sales-related telephone calls to any person who has indicated a desire not to receive such calls.

This includes those who have registered with state or federal "Do Not Call lists," as well as those who have previously told us directly that they do not wish to receive such calls. Regulations may permit, however, that we contact individuals on state or federal do not call lists under certain circumstances.

Lee's corporate policies require us to follow the laws of the states and the United States. Accordingly, we require all new employees who will have contact with a customer to be trained in Lee's best practices for conforming to the federal and state do-not-call restrictions.

E-MAIL RETENTION POLICY

The purpose of the email retention policy is to protect the company and employees of the company from potential business interruptions related to our internal e-mail system. It is the intent of the policy to establish reasonable guidelines for e-mail retention and storage. In the event we would be required to provide e-mail records for an outside source, this policy would allow us to proceed without large disruptions to the business. Additionally, should the company's e-mail servers fail, this policy allows the Lee Information Technology staff to return this essential service more rapidly.

Lee Enterprises, like other companies, is obligated to comply with legal requests for document production. E-mail is not exempt from such requests. This policy will set the requirements for all e-mail retention and thus enable the company to adhere to legal requests for e-mail production.

Location of E-mail:

All electronic copies of e-mail should be stored only in a Microsoft Exchange mailbox or in a Microsoft Exchange Folder. E-mail stored in these two locations can always be accessed by date and therefore can be purged at the appropriate time.

Length of Retention:

Individual mail items in any folder must be purged after 24 months. No employee may electronically store e-mail in Microsoft Exchange folder or mailbox longer than 24 months. This includes mail that was electronically stored outside of the Exchange e-mail system before this policy went into effect. E-mail

age is based on the date the message was sent. Keeping a maximum age on mail stored electronically will also manage the size of e-mail databases within Lee.

Adherence:

Adherence to this policy is a requirement to use Lee's e-mail system. Automated processes will purge e-mail over 24 months old. Each employee must agree not to store e-mail electronically outside of the Exchange mail system. If you have any questions about your e-mail or how this policy will affect your e-mail, please contact the Lee Information Technology staff.

Violation of Policy:

Each employee of the company is responsible for adhering to this policy. Any deviation from this policy by an employee may result in discipline to the employee up to and including termination of employment.

E-MAIL, SOFTWARE LICENSES & COPYRIGHTS POLICY

Purpose

The use of e-mail, Outlook, voice mail, the Internet and other forms of electronic communication (collectively "electronic communications") can enhance productivity and improve efficiency. The use of electronic communication can present problems, however, that may put Lee Enterprises and Lee Enterprises' assets at risk and, in some instances, prove detrimental to an enjoyable working atmosphere and the spirit of teamwork that Lee Enterprises depends upon for its success. The following policy is intended to foster the appropriate and beneficial use of the company's computers and electronic communications equipment.

Personal Use

Use of the company's computer system and electronic communications equipment is intended to be for business purposes. Lee Enterprises does not prohibit the infrequent use of such equipment for personal reasons. Personal use must be limited, however, to times when you are not expected to be working on company matters. Personal use may not interfere with your responsibilities to Lee Enterprises. The company's computer system and electronic communications equipment may not be used to solicit or proselytize others for commercial ventures, religious or political campaigns/causes, outside organizations, or other non job-related solicitations. However, the occasional use of the company's computer system and electronic communications equipment e-mail is permitted for such non-job-related communications as charitable solicitations, birth announcements, invitations to personal social gatherings, offers of personal tickets to entertainment and/or sports events, personal items for sale, and invitations of a personal nature, i.e. dog walking, house sitting. Please keep in mind that any personal use of the company's computer system and electronic communications equipment is not private, and that the company may monitor and review such use.

Use of instant messaging products is intended to be for business purposes. Unless otherwise prohibited at your location, Lee Enterprises allows the use of instant messaging for personal reasons. Personal use may not interfere with your responsibilities to Lee Enterprises. Please keep in mind that any instant messaging activity on a company owned computer is not private, and that the company may monitor and review such use.

Access to the Company's Computer System and Electronic Communications Equipment

The company's computer systems contain a large volume of confidential communications, proprietary information, copyrighted works, as well as extremely sensitive information about the company's financial operations, its business plans and the like. The disclosure of confidential or sensitive information could be extremely harmful to the company. It is important that no one use any computer or electronic communications equipment without proper authorization. Additionally, no one should assist in, encourage, or conceal from the company any unauthorized use, or attempted unauthorized use, of such equipment.

An individual who uses the company's computers or electronic communications equipment needs to have a user ID and password. This user ID and password is for a single user and is not to be shared with anyone inside or outside the company.

All users of company computer and electronic communications systems must be company employees or authorized contract employees. The use of company systems by non-employees is prohibited. The personal use of computer systems is limited only to employees.

Computers and electronic communications equipment used on the company network must be company owned and managed. Computers and electronic communications equipment owned by employees may not be used on the company network. Use of unauthorized equipment, including, but not limited to, desktop computers, laptop computers, PDAs, wireless hubs and switches, on the company network presents a serious risk to the operation of the company and is prohibited. When there is a legitimate business need, an employee may be given remote access to the company network for a personally owned computer connected via dial up or virtual private network. This use is limited to personally owned computers that have current antivirus signatures and current operating system updates. Use of the corporate VPN is monitored. You may be required to show proof of updated antivirus software and operating system updates.

Respecting the Rights of Others:

Property Rights:

1. Software – Computer software (i.e. programs, manuals and related materials, whether on disk, in writing or in any other tangible form) is protected by the copyright laws of the United States, and may be protected by United States patent laws as well. It is unlawful to use, copy, or even install such software on a computer without the permission of the copyright owner (usually in the form of a written agreement called a “license”). The consequences of such activity, known as “infringement” can be extremely severe, including but not limited to financial penalties of up to \$500,000 for a single act of infringement. Accordingly, you may not copy, download from the Internet or computer bulletin board, install onto a company computer or otherwise use any software in violation of applicable copyrights and license agreements. At no time may personal software be installed without permission from the enterprise operating executive. Company computer systems will be routinely audited for copyrighted software.
2. Information and Data – Information and data available for downloading from the Internet or computer bulletin boards may be protected by trademark or copyright laws. The fact that material may not display the symbols "©" or "®", does not mean the content is unprotected. Unless a web site or bulletin board specifically states that no copyright protection exists, you should presume the material to be protected. Illegal or unauthorized duplication of material protected by trademark or copyright law is specifically prohibited.
3. Digital Content – Any downloads of photos, art, fonts or other creative content from a website or FTP site must be authorized by the copyright holder and the local technical support manager. Movie files and MP3 files should not be downloaded to company computers or through company

networks without prior authorization of the copyright holder and the local technical support manager and a legitimate business need.

You should not assume any right of privacy in the personal files or e-mail messages maintained on any company computer or on the network. The company reserves the right to review, inspect the content of, and monitor all information residing on all computers, file servers and electronic communications equipment.

Decency in Communications

The use of the Internet and other electronic communication equipment must comply with all laws and regulations and shall exhibit the highest moral and ethical standards of business conduct. Illegal, unethical or inappropriate behavior will not be tolerated.

Internet users shall comply with the regulations and policies of news groups, mailing lists and other public forums through which they disseminate messages. You must investigate the appropriate rules and customs of any Internet news group or mailing list you are planning to involve yourself with before participating in such activity. Assume that everyone in the world can read what you are posting, that permanent copies will be kept at several sites, and that you will be expected to take full responsibility for everything you say. Do not post anything that you would not want to see quoted in a newspaper.

There is to be no display or transmission of sexually explicit images, including but not limited to nude images and pornography, messages, or cartoons, or any transmission or use of e-mail communications that contain ethnic slurs, racial epithets, or anything that may be construed as harassment or disparagement of others based on their race, national origin, sex, age, disability, religion or other characteristic protected by law. Violation of this policy will result in corrective action, up to and including discharge from employment. Any employee who discovers a possible violation of this policy is required to advise the company of such possible violation using the reporting procedures set forth in the Harassment and Sexual Harassment policies contained in this employee handbook.

The uploading or downloading, displaying or distribution of sexually suggestive pictures or text on a monitor, a printed copy or otherwise, is expressly prohibited. Any use of electronic communications equipment to transmit offensive or sexual explicit material is strictly prohibited.

Use of the company's computer system and electronic communications to send, forward or transmit jokes, cartoons, rhymes, humorous stories or other like materials ("humor e-mails") should be made with caution. Humor e-mails transmitted from a company computer will show the e-mail address of the sender. This address will remain with the humor e-mail as it is sent to other third parties. Humor e-mails of an ethnic, racial, religious, gender, age or sexual context may not be sent from a company computer or through any electronic communication. Before transmitting any humor e-mail from your home computer, any reference to the company or "lee.net" should be removed. Do not send humor e-mails that you would be unwilling to share with a public audience or publish in a company newspaper.

Preserving System Integrity

Downloading of information and programs must be done with caution. Computer viruses can be transmitted through the downloading of programs and the viruses may have a devastating effect on the company's computer systems. Our system maintains a constant surveillance for viruses. Any message that appears on your screen suggesting that a virus has been transmitted to your computer must not be ignored. You must contact your local network administrator immediately before you proceed any further with the use of your computer.

At times it may be necessary to quarantine certain computers in order to protect the network from harm during a virus or worm outbreak. The local network technical support manager will determine when it is safe to allow those computers back on the company network.

Use of the Lee nationwide data network for streaming media applications

The Lee Enterprises nationwide network is made up of various local and wide area networks. These network resources are provisioned by various vendors to which Lee Enterprises pays a monthly fee based on the amount of bandwidth used. One application that uses significant amounts of bandwidth is streaming media, often used for listening to audio or watching video over the Internet. While Lee Enterprises promotes using its network resources and applications for training and other businesses purposes, it does not allow these resources to be used for personal entertainment. It is therefore required that streaming media applications to be used for business purposes only.

The personal use of downloaded MP3 files or any other downloaded audio/video files is prohibited.

Use of peer to peer networking applications

Because the company's computer systems and electronic communications equipment are critical to our daily operations and contain a large volume of confidential information it is against company policy for any individual to install or configure any type of peer to peer networking or remote control software without the prior approval from the local Enterprise Information Systems staff. These applications include but are not limited to Gnutella, Napster, Morpheus, Gotomypc, Symantec PC Anywhere and Microsoft Remote Desktop. These applications pose a significant risk to the security of corporate computing resources. If these types of applications are required for business purposes they must be approved, installed and configured by the local Enterprise Information Systems staff.

EQUAL OPPORTUNITY EMPLOYER

It is our policy to provide equal opportunity to all qualified persons seeking and continuing employment with Lee Enterprises. We comply with all federal and state employment opportunity laws and do not discriminate in our employment and personnel practices against any person on the basis of race, color, creed, religion, national origin, sex, age, disability, marital status, sexual orientation or as otherwise provided by law.

Lee Enterprises encourages present employees to refer qualified minority and female applicants for all job openings. Any offer of employment or termination of employment initiated by the company must be approved by the department head. Questions regarding the employment or promotional practices of Lee Enterprises should be referred to the VP Human Resources.

INFORMATION SECURITY

Our computer resources and the information that is processed by our computers are valuable resources that require protection. Information being processed, of particular concern, may include data which is sensitive in nature and/or credit cardholder data. In recognition of this, a comprehensive Information Security Policy has been created as a supplement to the general Security Policy. The Information Security Policy outlines the role each Lee employee plays in maintaining the security of company information.

Although Lee's Corporate Information Technology ("I.T.") Department will provide the direction and technical expertise to protect company information, it is each employee's responsibility to understand

their individual role to ensure the protection of this information. For instance, the policy outlines the requirements for establishing a connection to Lee's network and clarifies what kinds of connections are permissible. A key aspect to maintaining the security of information is protecting individual passwords. It is each employee's responsibility to ensure that their personal passwords are stored in an area that may not be accessed by a third party. For more information on this and other aspects of information security, please see the complete Information Security Policy on LINK.

MOBILE PHONES

In order to maintain employee productivity, the company issues mobile phones to certain employees in key positions so they can stay in contact while they are out of the office on business.

The company encourages employees to remember safety at all times. You should not use a mobile phone while driving.

All staff members driving on business are expected to conduct themselves in a safe and legal manner, obeying posted speed limits and avoiding taking notes while driving.

OPEN DOOR POLICY

Lee Enterprises maintains an open-door policy for all employees. You are encouraged to follow the procedure outlined below for problem resolution:

- If you find a situation or condition to be a problem, see your immediate supervisor or department manager. Discuss the problem and offer any suggestions you have for resolving the problem.
- If you do not feel that the situation has been satisfactorily resolved, make an appointment with the VP Human Resources, your department head or enterprise leader without any fear of recrimination.

In most cases, your concerns should be able to be cleared up between you and your supervisor. If the problem is too sensitive to discuss directly with your supervisor, please go directly to the Director of Human Resources or your department head. You may also call the toll-free Lee Open Door Line.

OPEN DOOR LINE

Lee believes strongly that every employee deserves to be treated with dignity and respect. That's why you should find every manager's door open to hear any concern you might have about the company, your job or your workplace. If you have any concern, talk with your supervisor, your department manager, your human resources representative or your enterprise leader.

You also may call the toll-free Lee Open Door Line: **1-877-LEE-4YOU (1-877-533-4968)** and leave a message so a senior member of the human resources staff can get back with you and arrange a time to discuss your concern.

PROTECTION OF SENSITIVE DATA POLICY

Sensitive Information

The protection of sensitive business information is vital to the interests and the success of the company. Sensitive business information includes, but is not limited to, the following examples:

- **Compensation Data**
- Client/customer Data
- **Personal employee information**
- Financial information and pricing policies
- Marketing data, strategies, and research
- Pending projects and proposals for news stories
- Confidential news sources
- New personnel acquisition plans
- Business acquisition plans
- Operations methods
- Internally developed software and computer programs
- Advertising preprinted material (advertising inserts)
- Any other information deemed confidential or proprietary by the company
- Network and security infrastructure information

Employees are prohibited from disclosing sensitive business information without the express permission of the enterprise operating executive or an officer of Lee Enterprises, Incorporated. Employees who have questions about whether certain information is sensitive in nature should contact management as appropriate. Disclosure or improper use of sensitive business information can result in disciplinary action, up to and including termination of employment.

All sensitive information, when practical, should be stored in locked cabinets when not in immediate use. When no longer necessary for business purposes, it shall either be shredded or kept in a locked shred bin.

Responsibility for Security of Cardholder Data

All employees and/or contractors must protect all sensitive information regardless of the form in which it is held. This includes, but is not limited to, devices potentially containing sensitive data such as mobile phones, laptops, PDA's, E-Mail etc.

Access to sensitive information such as cardholder data should be limited to those who have a business reason to possess such information. If access to sensitive information is required by a contractor in order to perform their contracted duties, they shall be required to adhere to the same standards of conduct as that of a Lee Enterprises' employee.

Use of Cardholder Data

Use of cardholder data is limited to completing a transaction, supporting a loyalty program, providing fraud control services, or for uses specifically required by law.

All users are responsible for maintaining the confidentiality of sensitive information. Users may not reveal or allow disclosure of sensitive or confidential information to any individual who or business entity that is not authorized to view the information. Use of cardholder data is limited to those items listed above. Any question regarding any other use of cardholder data or whether an individual or business entity is authorized to view the information should be directed to the Corporate Director of Network Security and Telecommunications (currently Craig Benisch).

Availability of Cardholder Data

In the event an enterprise desires to use a Contractor to retain credit card data or perform backups of the data, the Contractor must be pre-authorized by the Corporate Director of Network Security and Telecommunications (currently Craig Benisch) and proven to be PCI Compliant. In the event of an audit, all data must be available at Lee Corporate or an enterprise location.

Storage of Cardholder Data

Cardholder data storage must be kept to a minimum by appropriate data storage and retention policies. Cardholder authentication data, such as magnetic strip or chip data, card-validation codes, or PIN verification values, must not be stored subsequent to authorization, even if encrypted. All sensitive and/or confidential information (however received) should be shredded immediately following use, or kept in a locked shred bin.

SPEAKING ENGAGEMENTS

For matters involving an individual newspaper or enterprise, the publisher or enterprise leader is the only official spokesperson but may designate others to speak on selected topics. For matters involving Lee Enterprises as a whole, the only official spokespersons are designated officers. Requests for representatives of Lee Enterprises to address groups on topics relating to the company's philosophy, operational policies or the newspaper industry must be approved by an officer of the company.

TELEPHONE COURTESY AND USE

In serving our client population and the citizens of this community, many contacts are made over the telephone. It is important to give callers prompt and courteous attention. Your telephone attitude and manners will make a strong impression on the people we serve. When using a company telephone, keep the following in mind:

- Answer promptly and politely
- Identify the department and yourself
- Speak distinctly and pleasantly
- Take a message if the person called is not available
- Always be helpful and friendly

Personal calls while at work are discouraged. Important personal calls should be confined to as short a period as possible.

Each station or desk has been provided telephone usage instructions, a list of internal extension members and local telephone directories.

If you are unable to answer your telephone, voice mail is available to record messages for you. It is important to keep your voice mail greetings current, and to return your voice mail messages promptly.

UNION POLICY

We are committed to workplace policies that are enforced fairly and consistently. We have practices and procedures to help resolve problems. We have an open door policy. Our desire is to have people in the company deal with each other on a direct, individual basis. For these reasons, we sincerely believe that employees do not need to be represented by a union.

We also recognize and respect an employee's right to be a member of a union. Regardless of union membership, we look to each employee to help maintain good employee relations and look for ways to improve the working climate. All of us working together as a team is the best way to make this a healthy organization.

USE OF BUSINESS EQUIPMENT

All business equipment, electronic mail, telephone and computer systems as well as all data, communications and stored information transmitted, received, or contained in Lee Enterprises' information systems are the property of Lee Enterprises and are to be used only for business-related purposes. Employees are prohibited from using computer software, computer codes, accessing files, or retrieving any stored communication for non-job related purposes. No employee may create or use a computer pass code unknown to Lee Enterprises. Use of business equipment for correspondence containing language that may be construed as harassment or disparagement of others based upon sex, race, age, national origin or any other protected classification is strictly prohibited. To ensure the proper use of business equipment, Lee Enterprises reserves the right to monitor and review employee use of these systems, including e-mail messages.

USE OF MOTOR VEHICLES

Minimum Requirements

Motor Vehicle Records must be run on all applicants and employees being considered for a position requiring them to drive on company business. Additionally, proof of insurance must be obtained for those required to drive their own vehicle on company business. Driving records must meet minimum acceptable guidelines in order for a final offer for the position to be made. Driving records and proof of insurance must be checked at least annually on current employees to ensure minimum guidelines are met.

Use of Company Motor Vehicles

Employees may be assigned the use of a company vehicle for company business. Company vehicles are for use only in the performance of the employee's job for the company. Lee prohibits the use of a company vehicle by anyone other than the employee. Furthermore, the company vehicle may not be used for personal travel.

It is strictly and absolutely against company policy to drive a company vehicle or a personal vehicle on company business after the consumption of alcoholic beverages or when under the influence of illegal controlled substances. Smoking in all company-owned vehicles is prohibited. Use of any vehicle in this manner when on company business is strictly prohibited.

Use of Personal Vehicles for Business Purposes

Employees may be required to use their personal vehicle for company business. Any personal vehicle used must be properly insured. Employees who use their vehicle for company business are required to provide proof of insurance to Lee Enterprises. Employees shall receive a mileage allowance for the use of their personal vehicle. The mileage allowance is to cover the cost of not only gasoline and maintenance, but insurance premiums as well. The employee also must assume the deductible risk for damage to the vehicle in the event an accident occurs while conducting company business.

Safety

All persons driving or as a passenger on company business are required to wear seat belts. Also, no vehicle should be operated unless it is in safe operating condition.

Traffic Violations

Any employee driving a company vehicle, or driving a personal vehicle for company business, is personally responsible for moving and parking violation fines. There are no circumstances under which Lee will pay for such violations. Employees required to drive in their job position with Lee must possess a valid driver's license and valid auto insurance. The Human Resources Department must receive a copy of the driver's license and insurance card before an employee is reimbursed for mileage for use of a personal automobile.

Traffic Accidents

If an employee is involved in a traffic accident involving a company vehicle, or while using a personal vehicle for company business, the following procedure should be followed:

- Determine whether anyone is hurt.
- Never state that you are at fault, regardless of the circumstances.
- Determine the extent of the accident.
- Always get the following information.
 - The other motorist's name
 - The license number of the other vehicle
 - The other motorist's driver's license number
 - The other motorist's home address
 - The make and year of the other vehicle
 - The other motorist's insurance company and policy number
- No matter how small the accident, contact your supervisor right away.
- You should provide insurance company and policy number information to the other motorist, if asked.

Employees are required to report any accident that occurs in a company vehicle or while on company business to his/her supervisor immediately, or as soon as possible. In no event should such report be made later than 24 hours after the accident.

BUILDING & GROUNDS

ACCIDENTS AND INJURIES

We must all work to maintain workplace safety and prevent accidents. When an accident does happen, the injured person should be treated as quickly and competently as possible. First aid boxes are located throughout the building, and you should know where to find the one nearest your work area. If more than first aid is needed, the injured person should be taken to a hospital. Call “9-911” in the case of severe injuries or unconsciousness. The injured person should not be moved until competent medical advice is obtained. In the case of a minor injury not requiring emergency attention, you may arrange to see a physician at your personal discretion.

Employees must report an injury to their immediate supervisor, preferably in writing, as soon as reasonably possible and in all events within 24 hours of the accident or injury. The supervisor should obtain all the necessary information for workers' compensation and OSHA records. This information should be given to the Director of Human Resources as soon as possible.

FIRE PROCEDURES

Please always be extremely conscious of the hazards of fires in work areas. Our building is equipped with automatic fire sprinklers and hand held fire extinguishers. You should familiarize yourself with the locations of fire extinguishers and building exits. NEVER USE AN ELEVATOR DURING A FIRE.

If you discover a fire, activate the fire alarm. If you are near a phone, dial 911. Notify your co-workers of the danger and leave the building. Do not be bashful about calling 911, even if you only think you smell smoke. It is preferable that the fire department be called for what turns out to be a false alarm than to take a chance. Above all, do not risk your personal safety.

When you leave the building during an emergency situation, proceed to the designated area to await instructions. Please do not leave until it is safe to return to the building so that everyone can be counted as safe.

SOLICITATION AND DISTRIBUTION OF MATERIALS

In the interest of efficiency and safety, employees of Lee Enterprises are prohibited from engaging in solicitation of any kind during working time. Employees are also prohibited from engaging in the distribution of non-business materials of any kind during working time in work areas.

Employees wishing to solicit or distribute non-business materials may do so only with approval from Human Resources.

VISITOR POLICY

A visitor is any individual who is not currently an employee of our company. All visitors must check in with the receptionist. To assist the receptionist in dealing with visitors, employees should inform the receptionist in advance of visitor's names and expected time of arrival. The receptionist will maintain a list of expected visitors and contact the appropriate staff employee when the visitor arrives. Employees will come to the reception desk and escort visitors while in the building.

The employee hosting a visitor is responsible for assuring that the visitor does not wander through the building. This includes all visitors at any time — regular business hours, nights and weekends.

We welcome occasional and brief visits from family and friends. From both a professional and business liability perspective, however, it is inappropriate for employees to have family members or friends in the building for more than brief periods of time during work hours.

For health and safety reasons, personal pets are not allowed in any company building. This applies to outside customers and vendors as well as employees. Service animals are acceptable at any time.

You should not be in the building during off hours unless it is for business reasons. If you bring visitors with you during non-regular hours, they must stay with you at all times.

WORKPLACE SAFETY

We are committed to ensuring that all safety and health policies and procedures involving workplace security are clearly communicated, understood and followed by all employees. All employees are responsible for using safe work practices, for following all directives, policies and procedures and for assisting in maintaining a safe and secure workplace. These include but are not limited to:

1. No weapons are to be brought into the workplace. Weapons are defined as firearms, knives with blades of 2½ inches in length or more, explosives, chemical agents or other such devices that may be used as a weapon.
2. No employee shall threaten mental or physical harm to others.
3. All employees are required to report any and all threats and/or acts of violence to the Human Resources representative immediately. Employees may also make a report by calling the Lee Open Door Line at 1-877-LEE-4YOU (1-877-533-4968). All employees are responsible for cooperating in the investigation of threats and/or acts of violence in our workplace.
4. All employees are responsible for reporting any breach of security in our workplace, and making recommendations for improved security.
5. All employees are held accountable for not breaching security measures or bypassing security devices within our workplace.
6. All emergency escape routes are to be maintained free of encumbrances.

Our workplace is defined as all owned or leased buildings, parking lots, use of company owned or leased vehicles or use of the employee's vehicles on company business. The definition is extended to include business conducted at all customer's or business associate's properties and the course of community activities as a representative for the company.

EMPLOYMENT INFORMATION

ATTENDANCE & PUNCTUALITY

Whatever your job, you have an important daily role. Attendance and punctuality are essential for every member of the staff.

Unscheduled Absences

If you are unable to report to work at your scheduled time, you must contact your supervisor as soon as possible. The company recognizes that there may be times when you are unable to work because of illness or personal emergency. If this happens, you must notify your supervisor as soon as possible before your scheduled starting time so proper arrangements can be made to cover your job. If your supervisor is not available, leave a message and then contact the next person in authority in your department. It is important that you keep your supervisor informed of your situation each day that you will be unable to report to work. Careful record of absences will be kept and will influence performance appraisals to the extent permitted by law. If you are absent for three or more days due to an illness or injury you may be required to obtain a physician's statement to return to work.

Discipline

Unscheduled absences place an unfair burden on co-workers and should be avoided. Unscheduled absences, including late arrivals and early departures, will result in discipline, up to and including discharge. Any employee who is absent for three working days without notification is deemed to have resigned voluntarily.

Absences or instances of lateness covered by an employee's use of approved FMLA leave will not result in disciplinary action. For detailed information about FMLA's eligibility requirements and procedures, contact the Human Resources Department.

CHANGES TO YOUR POSITION

In order to accommodate the business needs, employees may be required to transfer jobs or accept different or additional work. Additionally, the company may re-evaluate or eliminate a position as required.

COMMUNICATION

Your supervisor will provide you information orally and in writing. You should always read information contained in memos and e-mail, and you should speak with your supervisor if you have any questions.

You also will receive information in other ways: through departmental and general staff meetings and corporate newsletters.

The Lee Enterprises corporate website, www.lee.net, is a helpful source of information. If you are online at the office, you also may access Lee's Intranet at www.lee.net/intranet. LINK is the employee online resource for information, news and knowledge about the company and is accessible from your home or the office at <https://link.lee.net>.

Also, please watch bulletin boards located throughout the building for further information. Departments may also maintain bulletin boards within their work areas. Only information approved by your local management may be posted on any bulletin board. Your managers may refuse permission to post a notice and will remove any unauthorized posting.

EMPLOYEE CLASSIFICATION

Your job will be classified in one of the five categories detailed below. This classification will determine your eligibility for benefits as well as the benefit level.

Full-time Employees: Employees who are scheduled to work 40 hours per week or more. Full-time employees are eligible for benefits as described in the Benefits section of this handbook.

Regular Part-time Employees: Employees who are scheduled to work between 30-39 hours per week. Regular part-time employees are eligible for benefits on a pro-rated basis as described in the Benefits section of this handbook.

Part-time 20+ Employees: Employees who are scheduled to work between 20-29 hours per week. Part-Time 20+ employees may be eligible for some benefits on a pro-rated basis as described in the Benefits section of this handbook.

Part-time 19 Employees: Employees who are scheduled to work less than 20 hours per week. Part-Time 19 employees are not eligible for benefits.

On-call Employees: Employees who are hired to work for the duration of a specific project or assignment. On-call assignments generally do not extend beyond a 90-day period. On-call employees are not eligible for benefits.

EMPLOYMENT OF RELATIVES

Relatives of employees may apply for positions for which they are qualified. The hiring of relatives of employees must be approved by the Enterprise Operating Executive or the Vice President of Human Resources.

There are restrictions in the employment of relatives working in the same department. Any exceptions to these restrictions must be made in advance and with approval of the Enterprise Operating Executive or the Vice President of Human Resources.

1. Relatives of supervisors may be employed at the same operating unit but not in the same department or under the same sphere of influence.
2. Relatives of non-supervisory employees may be employed in the same department with advance approval of the Enterprise Operating Executive or the Vice President of Human Resources.

The conditions of employment of such relatives shall be the same as for all other employees, including compensation, employee benefits eligibility, performance reviews, etc.

This policy shall be applied in a manner consistent with state and federal law.

EXIT INTERVIEWS

When you leave employment at Lee Enterprises, you will be asked to complete an exit interview to share your candid comments about your work at Lee Enterprises.

INVESTIGATIVE SEARCHES

Lee Enterprises wishes to maintain a work environment that is free of illegal drugs, alcohol, firearms, explosives, or other improper materials. To this end, Lee Enterprises prohibits the possession, transfer, sale or use of such materials on its premises. Lee Enterprises requires the cooperation of its employees in administering this policy.

To carry out the above objective, Lee Enterprises may, from time to time, have designated representatives conduct investigative searches on company property without notice. Searches may be made of an employee, employee's property, and of all areas of company property including those designated for the employee's use. Property includes, but is not limited to, personal effects, desks, file containers, storage lockers, lunch boxes, and vehicles. Any employee who refuses to submit to a search will be subject to disciplinary action up to and including termination. Investigative searches of the type described above may also be completed in the investigation of other policy violations.

JOB OPPORTUNITIES AND PROMOTIONS

Our company encourages the promotion of current employees whenever appropriate. Generally, regular job openings within Lee Enterprises will be available for viewing at www.lee.net. This information will also be available on LINK at link.lee.net. If you are interested in a posted job, discuss the matter with your supervisor or your human resources representative.

Promotions are not automatic nor are they based on service. They are based on an individual's qualifications, current and past performance, an assessment of the applicant's potential for greater responsibility, and the requirements of the position in question.

PERFORMANCE REVIEWS

Your performance will be reviewed at least annually. This is an opportunity to meet with your supervisor to discuss your performance and your feelings about your job. When warranted, your performance may be reviewed more frequently than annually.

If you change positions or status your review date will be the date of the change. Some positions may require that your performance be reviewed after three months of service in this new capacity.

PERSONAL CONDUCT

The orderly and efficient operation of our company requires that employees maintain discipline and proper personal standards of conduct at all times. We believe that there is not an effective method of pre-determining the seriousness or effect of any one violation, nor can we make an exhaustive list of all possible violations. Conduct that we find unacceptable in the workplace includes, but is not limited to:

- Physical violence in the workplace
- Fighting
- Insubordination

- Theft
- Falsification of time records
- Reporting to work under the influence of drugs or alcohol
- Threatening co-workers
- Dishonesty

Although some violations may be more severe than other violations, repeated violations, or a combination of violations, may result in disciplinary action, up to and including termination of employment. Lee Enterprises, in its sole discretion, will determine the appropriate measure of discipline of its employees.

A supervisor will make a written memo or report of the facts leading up to discipline. A copy of this memo or report will be read and signed by the employee, indicating receipt of report, and placed in the employee's personnel file.

Possible disciplinary actions include, but are not limited to:

Verbal Warning

When an infraction of a work rule occurs, a supervisor may visit with the employee about the incident. An oral warning alerts the employee that the behavior is unacceptable and gives the employee an opportunity to show improvement. Keep in mind that Lee Enterprises may consider the infraction to be of such severity that immediate termination of employment will occur.

Written Warning

A written warning may occur when Lee Enterprises considers the infraction too severe for an oral warning. A written warning also may occur when the employee has already been warned orally for the offense, but has failed to show acceptable improvement.

Suspension without Pay

In cases where an employee has already received a written warning or where a violation of a work rule is severe, the employee may be given a disciplinary suspension, without pay, for a specified period of time.

In instances where immediate action is necessary to deal with a severe disciplinary problem (such as fighting, intoxication on the job, or gross insubordination), the employee may be asked to leave the premises for a specified period of time. Such a suspension may be with or without pay.

Discharge

The company may discharge an employee for any reason, including unacceptable work performance or misconduct. If the discharge is due to poor work performance, the employee will generally be notified of such problems prior to the discharge. An attempt will be made to give the employee advance written notice of work problems so that the employee has an opportunity to improve performance. If the employee's work remains unsatisfactory, then the employee will be discharged.

NOTHING IN THIS POLICY IS INTENDED TO LIMIT IN ANY WAY LEE ENTERPRISES' OR AN EMPLOYEE'S RIGHT TO TERMINATE THE EMPLOYMENT RELATIONSHIP AT ANY TIME, WITH OR WITHOUT CAUSE, AND WITH OR WITHOUT ADVANCE NOTICE.

PERSONNEL FILE INFORMATION

Records Retained

Only job-related information will be entered and maintained in an employee's personnel file. An employee's payroll records will include copies of pertinent documents such as withholding tax form W-4, direct deposit instructions, authorizations for deductions, wage assignments and garnishments.

It is your responsibility to ensure that your personnel and payroll file contains accurate, up-to-date information. Accurate information is necessary to administer payroll, insurance and other benefits. This information is also vital to know who to contact in case of an emergency. Update any changes in your personal information or that of your dependents on Lee Information, News & Knowledge (LINK) at link.lee.net.

Review

Only an employee's direct supervisor or manager with a business-related "need to know," as determined by the VP Human Resources, may examine an employee's records. Employees may request to review the contents of their individual human resources file or payroll record. Lee Enterprises reserves the right to remove certain sensitive documents, including letters of reference and management planning documents such as succession or promotion plans. To prevent abuses of this access privilege, Lee Enterprises also reserves the right to limit the number of times an employee can access his or her file during a 12-month period. The request should be made to the Human Resources Department and a time will be set up for the review under the following guidelines:

- A human resources representative will be present during the review.
- Nothing may be removed from the file, however, notes may be taken and documents may be copied.
- Employees may request deletion of documents or correction of inaccurate information. If the human resources representative does not agree to make requested deletions or changes, employees may request that a statement of disagreement be added to the file.

Disclosure or release of employee information.

In response to an information request from an outside organization, individual or other nongovernmental entity, Lee Enterprises normally verifies only the employment status and dates of employment for former or present employees. Lee Enterprises generally does not provide any other information unless and until it has received from the employee or former employee a written request that it disclose or confirm additional specific information.

Misrepresentations

Lee Enterprises relies upon the accuracy of information provided by prospective employees contained in the employment application, as well as the accuracy of other data presented throughout the hiring process and employment. Any misrepresentations, falsifications or material omissions in any of this information or data may result in Lee Enterprises' exclusion of the individual from further consideration for employment or, if the person has been hired, termination of employment.

TERMINATING EMPLOYMENT

Should you leave our employ, you should be aware of the following guidelines to ensure that your separation is as smooth as possible. Although not required, we ask that you give at least two weeks notice. Your notice should be in writing, indicating the reasons for leaving and the termination date. This process gives us time to begin searching for your replacement and minimizes the workload on your co-workers.

Unless otherwise required by state law, final paychecks will be mailed or deposited on the regular payday for the pay period in which your employment ends. To ensure prompt delivery of your final paycheck, please make sure the address on file for you is correct.

Employees considering retirement should notify the Human Resources department at least six months before the retirement date being considered to allow sufficient time for the proper forms to be completed. Human Resources will discuss your retirement benefits and available options with you.

TIMEKEEPING

Work Hours

You will be informed of the hours you are expected to be at work. Your supervisor will also inform you of scheduled breaks, if any. You may take a restroom break at any time.

Overtime & Recording Work Hours

State and federal laws classify positions as “exempt” or “non-exempt” based on the responsibilities of the position and the skills and training required. You will be informed of the classification of your position. The classification of your position determines whether you will be eligible for overtime payment.

Non-Exempt Employees – If your position is classified as non-exempt, you will be paid time-and-one-half for all hours worked over 40 hours in a single work week, unless otherwise required by state law. Pay for non-work hours such as sick pay, holidays and paid vacation are not included in the overtime calculation.

As a non-exempt employee, you must also keep an accurate account of the total hours you work each day as requested by your supervisor or the Payroll Department.

You may record only your own hours. Recording the time or “punching out” for another employee is strictly prohibited. Falsification of time records, which includes padding hours or not reporting all hours worked, is unacceptable conduct and will result in discipline, up to and including termination of employment. Mistakes in time records should be reported promptly to your supervisor or to the payroll administrator.

Unless specifically directed to work overtime hours, non-exempt employees should begin and end work at the designated time. You may not elect to work overtime at your own discretion. You are, however, expected to comply with all reasonable requests by your supervisor to work overtime.

Exempt Employees – Based on the nature of your job responsibilities, some positions are classified as exempt. Exempt employees are paid a salary for all hours worked and do not qualify for overtime pay.

BENEFITS

BENEFITS PHILOSOPHY

Lee Enterprises is proud to offer some of the best benefit programs in our industry. We recognize that employees have varying needs in terms of benefits, so we have developed a program full of options to allow you to choose what is right for you. Not only do we offer a variety of options for medical, dental, vision, and life insurance, we also have one of the best retirement account plans in our industry with many investment options so that each eligible employee may customize a benefits package that suits his or her needs. In addition, Lee offers long-term disability and employee stock purchase plans and a flexible spending account to eligible employees. We have provided information on some of our benefits in this handbook. You can also view information about each benefit and read summary plan descriptions on the LINK website located at link.lee.net. Please review these materials to learn more about our benefit programs.

If you are eligible for benefits, you must enroll through link.lee.net within 31 days of your date of hire. If you have a status change or qualifying event, such as birth or marriage, you must request the change within 31 days of the event. Coverage will be effective first of the month following the request. The next opportunity to enroll or make changes will be open enrollment in the Fall for the next calendar year.

As with all other policies in this handbook, we reserve the right to change, modify, or revoke any of the benefits described in this section. You will receive notice of any such change, but it may not be advance notice.

FAMILY AND MEDICAL LEAVE

In accordance with the Family and Medical Leave Act (FMLA), Lee Enterprises grants leave without pay to eligible employees for up to 12 weeks in a 12-month period. Eligible employees may receive up to 26 weeks of FMLA leave to care for a covered service member as detailed in this policy. The time off is not paid, unless the employee is taking vacation, personal or sick leave concurrently with FMLA leave. Employees can request FMLA leave to cover the time they need to be away from work for any of the following purposes:

- To care for a newborn child or a newly adopted or newly placed foster care child the employee's home;
- To care for a child, spouse, or parent who has a serious health condition;
- To provide employees time to attend to their own serious health condition that leaves them unable to perform their job;
- To attend to qualifying exigencies arising out of the fact that the employee's spouse, son, daughter or parent is on active duty or called to active duty status as a member of the National Guard or Reserves in support of a contingency operation; or
- To care for a covered service member with a combat-related serious injury or illness who is the employee's spouse, parent, child, or other relative for whom the employee is next of kin.

Lee Enterprise's Family and Medical Leave policy and practices comply with the federal Family and Medical Leave Act (FMLA). At the end of this policy, you will find a U.S. Department of Labor Notice

regarding employee rights and responsibilities under the FMLA. This policy provides some of the same information, as well as some additional information about Lee's FMLA practices. For a complete description of your rights under FMLA, please contact your Human Resources Manager.

Eligibility. To be eligible for FMLA leave, an employee must have worked for Lee Enterprises for at least one year and performed at least 1,250 hours of work during the 12 months prior to leave.

Requesting Leave. Employees should communicate their need for FMLA leave as soon as practicable. If the need for leave is foreseeable, then at least 30 (thirty) days advance notice must be given. Employees who cannot foresee the need for FMLA leave 30 days in advance must give as much notice as they can. This generally means notifying Lee Enterprises within one or two workdays of the time an employee first learns of the need for leave, unless extenuating circumstances exist.

You will be required to complete a "Leave of Absence Request" form and submit it to the Human Resources representative.

Amount of Leave. Employees can take up to 26 weeks of FMLA leave in a 12-month period, but no more than 12 weeks may be taken in the same 12-month period for leave due to the employee's own serious health condition, the birth of a child, to care for a newborn, due to the placement of child with the employee for adoption, or to care for a child, spouse or parent with a serious health condition, or because of a qualifying exigency. For intermittent leave, the total hours of leave available will be 26 times the number of hours in the employee's regular workweek. Lee uses a rolling calendar to determine FMLA leave available. The rolling 12-month period shall be a period of 12 months measured backwards from each date the employee begins to use FMLA leave. For example, if an employee requests FMLA leave beginning January 1, Lee Enterprises would look back 12 months from that date. If the employee took FMLA leave for their own serious health condition in that 12-month look-back period, it would be deducted from 12 weeks to determine how much leave the employee remained eligible to receive on January 1. All medical leaves that involve a serious health condition, including work-related medical leaves, will be counted against an employee's FMLA entitlement.

Where a husband and wife both work for Lee Enterprises, the two employees are limited to a combined total of 26 weeks of family leave in a 12 month period to cover the time off they need after the birth or placement of a child, to care for a seriously ill parent, or to care for a covered service member with a serious illness or injury. No more than 12 weeks combined may be taken for the birth of a child, to care for a newborn, due to placement of a child with the employee for adoption, or to care for a child, spouse or parent with a serious health condition, or because of a qualifying exigency. However, each employee is eligible to take any unused portion of the 12 weeks for his or her own serious health condition, the care of a seriously ill child, or the care of the other spouse.

Documentation Required. Employees who request FMLA leave because of a serious health condition, whether their own or a family member's, also must submit a Medical Certificate completed by their physician to the Human Resources Department before the leave can be approved. The Medical Certificate must be completed and returned to Human Resources within 15 days of your receipt of the form. Failure to return the form within 15 days will result in the denial of your request for FMLA leave, and the employee will be subject to the company's policies regarding unexcused absences, unless extenuating circumstances exist.

Employees taking FMLA leave may be required to submit recertification, at the employee's expense, from a health care provider to support a continuing medical leave every 30 days during the duration of the leave. Recertification will only be requested in instances in which the original certification does not specify the length of leave and/or in which the certification period has expired. Recertification on a more frequent basis may be required if: (1) the employee requests an extension of the FMLA leave, (2)

circumstances of the previous certification have changed significantly, or (3) information becomes available that casts doubt on the continuing validity of the most recent certification.

In the event recertification is not provided, the FMLA leave will be denied, and the employee will be subject to the company's policies regarding unexcused absences.

Intermittent Leave. Employees taking leave because of their own or a relative's serious health condition can take their allotment of FMLA leave intermittently or in accordance with a reduced work schedule if this is medically necessary. Where employees have some control over the timing of their leave, they are expected to consult with their supervisors to try to arrange a mutually acceptable time. Employees taking leave to care for a newly born or newly placed child do not have a legal right to take intermittent leave or work a reduced schedule, and can do so only with approval from Lee Enterprises. While on intermittent or reduced work schedule leave, an employee may be temporarily transferred to an alternative position with equivalent pay and benefits that better accommodates the recurring leave.

Privacy and Leave Requests. Employees must inform their supervisors that they need family or medical leave and when they expect to be absent. However, supervisors should not ask or inquire about the reasons for the employee's leave request. Instead, to ensure the worker's privacy, the Human Resources representative makes any necessary inquiries and evaluates whether there is a medical need for the leave. The Human Resources representative also is responsible for ensuring that all medical information provided by employees is maintained in the strictest confidence.

Benefits During Leave. Employees on FMLA leave continue to be covered by Lee Enterprises' insurance benefits for the duration of FMLA leave, provided any required employee contributions are made. FMLA leave does not cause employees to lose any previously accrued employment benefits.

FMLA leave is unpaid unless it is taken together with available paid leave. Employees must use any available paid leave concurrently with FMLA leave, unless prohibited by state law. Specific information concerning benefits will be outlined for you in an employee notification letter. Contact Human Resources for details.

Job Protection. On returning from an FMLA leave of absence, employees normally are restored to their original or equivalent positions with equivalent pay, benefits, and other employment terms. The only exceptions to this restoration procedure are for certain key employees, who are notified of their status when they first request FMLA leave. Key employees who take FMLA leave are reinstated to their former or equivalent positions only if their reinstatement does not cause Lee Enterprises substantial and grievous economic injury.

Return to Work Authorization. Employees on leave for their own serious health condition will be required to obtain authorization from their physician before returning to work from an approved FMLA leave of absence. Your position as well as any position description should be discussed with your physician. This document must be provided by the employee to Human Resources prior to returning to work. Failure to provide this authorization will result in a delay in the employee's return to work.

Compliance with FMLA Requirements. This policy is intended to comply with FMLA and should be interpreted in light of regulations implementing that act. In particular, terms used in this policy have the meanings they are given in the regulations implementing FMLA.

Effect of State Law. Lee Enterprises complies with all requirements, prohibitions, and other provisions of the state and local laws applicable in areas where it operates or does business. If a state law entitles an employee to more generous benefits than FMLA does, the employee receives the more generous benefits.

Leave for Qualifying Exigency Related to Member of Armed Forces. Eligible employees may take leave for qualifying reasons relating to a covered family member's active duty or call to active duty in the Armed Forces. This leave is available to eligible employees whose spouse, child, or parent has been called to active duty. This leave may be taken in a continuous period or on an intermittent or reduced leave basis. Eligible employees may be able to take leave for any of the following reasons:

- **Short-notice deployment.** Up to 7 days of leave may be taken when a family member receives notice of 7 days or less of an impending call or order to active duty.
- **Military events and related activities.** Leave may be taken to attend official ceremonies, programs, or events sponsored by the military and relating to the call to active duty. Leave also may be taken to attend support or assistance programs or informational briefings sponsored by the military, a military service organization, or the Red Cross, provided that the briefings or programs are related to the call to active duty.
- **Child care and school activities.** Leave may be taken to arrange for alternative child care necessitated by the call to active duty or to provide urgent or immediate care on a short-term basis to the child of a covered member of the military. Leave also may be taken to attend school or daycare meetings or conferences concerning a child of a covered member of the military.
- **Financial and legal arrangements.** Leave may be taken to make legal or financial arrangements relating to the call to active service, including situations in which the employee acts as the representative of a covered member of the military.
- **Counseling.** Leave is available to attend counseling which is directly related to and arising from the call to active duty.
- **Rest and recuperation.** Up to 5 days of leave is available to be with a covered military member who is on a short-term, temporary leave for purposes of rest and recuperation.
- **Post-deployment activities.** Leave is available for activities relating to the termination of active duty status. These activities include reintegration briefings and events, official ceremonies or programs scheduled by the military during the first 90 days following the termination of active status.
- **Other activities relating to the active duty.** Leave may be available for additional purposes provided the leave is related to the active duty of a covered military member.

Leave Due to Combat-Related Illness or Injury of a Family Member in the Armed Forces. Eligible employees may take FMLA leave to care for a spouse, child, parent or next of kin who is a service member and has suffered an illness or injury while on active duty. This leave, in combination with all other FMLA leave, may not exceed 26 weeks of leave in a single 12-month period. The next of kin of a covered service member is the nearest blood relative other than the service member's spouse, child, or parent. To qualify for this leave, eligible employees must document their relationship to the covered service member.

EMPLOYEE RIGHTS AND RESPONSIBILITIES UNDER THE FAMILY AND MEDICAL LEAVE ACT

Basic Leave Entitlement

FMLA requires covered employers to provide up to 12 weeks of unpaid, job-protected leave to eligible employees for the following reasons:

- For incapacity due to pregnancy, prenatal medical care or child birth;
- To care for the employee's child after birth, or placement for adoption or foster care;
- To care for the employee's spouse, son or daughter, or parent, who has a serious health condition; or
- For a serious health condition that makes the employee unable to perform the employee's job.

Military Family Leave Entitlements

Eligible employees with a spouse, son, daughter, or parent on active duty or call to active duty status in the National Guard or Reserves in support of a contingency operation may use their 12-week leave entitlement to address certain qualifying exigencies. Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings.

FMLA also includes a special leave entitlement that permits eligible employees to take up to 26 weeks of leave to care for a covered servicemember during a single 12-month period. A covered servicemember is a current member of the Armed Forces, including a member of the National Guard or Reserves, who has a serious injury or illness incurred in the line of duty on active duty that may render the servicemember medically unfit to perform his or her duties for which the servicemember is undergoing medical treatment, recuperation, or therapy; or is in outpatient status; or is on the temporary disability retired list.

Benefits and Protections

During FMLA leave, the employer must maintain the employee's health coverage under any "group health plan" on the same terms as if the employee had continued to work. Upon return from FMLA leave, most employees must be restored to their original or equivalent positions with equivalent pay, benefits, and other employment terms.

Use of FMLA leave cannot result in the loss of any employment benefit that accrued prior to the start of an employee's leave.

Eligibility Requirements

Employees are eligible if they have worked for a covered employer for at least one year, for 1,250 hours over the previous 12 months, and if at least 50 employees are employed by the employer within 75 miles.

Definition of Serious Health Condition

A serious health condition is an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility, or continuing treatment by a health care provider for a condition that either prevents the employee from performing the functions of the employee's job, or prevents the qualified family member from participating in school or other daily activities.

Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than 3 consecutive calendar days combined with at least two visits to a health care provider or one visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition. Other conditions may meet the definition of continuing treatment.

Use of Leave

An employee does not need to use this leave entitlement in one block. Leave can be taken intermittently or on a reduced leave schedule when medically necessary. Employees must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt the employer's operations. Leave due to qualifying exigencies may also be taken on an intermittent basis.

Substitution of Paid Leave for Unpaid Leave

Employees may choose or employers may require use of accrued paid leave while taking FMLA leave. In order to use paid leave for FMLA leave, employees must comply with the employer's normal paid leave policies.

Employee Responsibilities

Employees must provide 30 days advance notice of the need to take FMLA leave when the need is foreseeable. When 30 days notice is not possible, the employee must provide notice as soon as practicable and generally must comply with an employer's normal call-in procedures.

Employees must provide sufficient information for the employer to determine if the leave may qualify for FMLA protection and the anticipated timing and duration of the leave. Sufficient information may include that the employee is unable to perform job functions, the family member is unable to perform daily activities, the need for hospitalization or continuing treatment by a health care provider, or circumstances supporting the need for military family leave. Employees also must inform the employer if the requested leave is for a reason for which FMLA leave was previously taken or certified. Employees also may be required to provide a certification and periodic recertification supporting the need for leave.

Employer Responsibilities

Covered employers must inform employees requesting leave whether they are eligible under FMLA. If they are, the notice must specify any additional information required as well as the employees' rights and responsibilities. If they are not eligible, the employer must provide a reason for the ineligibility.

Covered employers must inform employees if leave will be designated as FMLA-protected and the amount of leave counted against the employee's leave entitlement. If the employer determines that the leave is not FMLA-protected, the employer must notify the employee.

Unlawful Acts by Employers

FMLA makes it unlawful for any employer to:

- Interfere with, restrain, or deny the exercise of any right provided under FMLA;
- Discharge or discriminate against any person for opposing any practice made unlawful by FMLA or for involvement in any proceeding under or relating to FMLA.

Enforcement

An employee may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against an employer.

FMLA does not affect any Federal or State law prohibiting discrimination, or supersede any State or local law or collective bargaining agreement which provides greater family or medical leave rights.

FMLA section 109 (29 U.S.C. § 2619) requires FMLA covered employers to post the text of this notice. Regulations 29 C.F.R. § 825.300(a) may require additional disclosures.



For additional information:
1-866-4US-WAGE (1-866-487-9243) TTY: 1-877-889-5627
WWW.WAGEHOUR.DOL.GOV



U.S. Department of Labor | Employment Standards Administration | Wage and Hour Division

WHD Publication 1420 Revised January 2009

LEAVE OF ABSENCE

A leave of absence is an approved absence from work without pay other than unpaid Family Medical Leave Act leave. Leaves are not granted automatically. Each request will be considered on the basis of the impact upon the department and your stated reason for the leave of absence. No unpaid leave is granted when paid time is available. Requests for a leave of absence must be submitted in writing to your immediate supervisor. Your supervisor will request approval from the appropriate Vice President. Approval must be in writing. Contact the Human Resources Department for details on how a leave of absence will affect your benefits.

MILITARY LEAVE

Lee Enterprises will comply with all federal and state laws governing employees who are called to active service or who volunteer for active service, including reservists. Our policy goes beyond the requirements of these laws.

Employees must notify their supervisor as far in advance as possible of the duty dates and provide them with a copy of their orders. Upon return from active duty, the employee must provide the Human Resources Department with a copy of military pay and allowances received during active duty in order to receive any appropriate differential.

The employee will continue, for up to twelve months, to receive the equivalent of their base pay, less any military pay they receive while in active duty.

For sales personnel whose compensation is primarily driven by commissions, we will average the income for the last three months to establish a base pay.

The employee will have ninety days to return to their employment after being released from active duty.

The returning employee will be returned to the same or a substantially similar position.

If the employee wants to continue Lee health, dental or vision coverage during their military leave, we will continue their Lee coverage at the same cost-sharing basis that existed prior to military leave for up to 24 months. Employees must inform Lee of their intent to continue coverage under Lee's health plan within 60 days of the date the leave of absence begins. Failure to do so will result in termination of coverage on the date the leave of absence began.

Life Insurance, Short and Long-Term disability coverage will cease at the beginning of the leave of absence. Upon return to eligible employment from military leave the employee will be reinstated in these plans.

If the employee is participating in ESPP, arrangements must be made by the employee to make required employee contributions prior to the expiration of the ESPP plan year.

If in place prior to the leave, Retirement Account Plan Profit Sharing Company Contributions will continue during the leave, and will be based upon the reservist's regular Lee base salary or weekly wages. Employee contributions may also be continued and will be company matched, as applicable. Arrangements must be made by the employee on leave for making employee contributions during leave or upon return to work.

SHORT TERM DISABILITY

Policy

This summary is intended to give employees information about Lee's Short Term Disability (STD) benefit program. This benefit is intended to provide you with continuing income in the event you are medically unable to work due to a serious, non-work related illness or injury. This benefit assists eligible employees by providing an income replacement when the employee is unable to report to work due to a qualifying medical condition.

Lee assumes all costs associated with this program. This program is not covered by the Employee Retirement Income Security Act (ERISA). Details regarding eligibility, benefits available, exclusions and limitations, and how to file a claim are contained in this policy.

Lee reserves the right to modify, amend, suspend or terminate, in whole or in part, any of the provisions of this policy at any time and for any reason. This policy does not guarantee continued employment in the event of an employee's sickness or disability. Lee Enterprises will make every effort to return the employee to the same position upon his or her return to work. In some situations, however, the employee may not be able to return to the very same position.

Eligibility

Full-time employees are eligible for this benefit after one consecutive year of service.

Part time employees who have worked an average of at least 20 hours or more per week within the previous 12 months are eligible for this benefit on the first of the month following one consecutive year of service.

Benefit Qualification

Eligible employees, as defined above, qualify for benefits as detailed below.

1. **Leave of Absence Request Form.** An employee requesting benefits under this program must complete this form and turn it in to their supervisor.
2. **Waiting Period.** An employee must be unable to work seven (7) consecutive calendar days due to their own disabling condition to become eligible to receive benefits. This waiting period is waived if the disability requires hospitalization of 24 hours or more. While in the waiting period, an employee must use available paid leave before any portion of the waiting period is unpaid. For purposes of this policy, "available paid leave" includes personal days, sick days, and awarded vacation time.
3. **Exhaustion of Available Paid Leave.** Employees are required to use all available paid sick or personal leave before they are eligible to receive benefits under this policy.
4. **Medical Certification.** Employees requesting benefits must have their health care provider complete a medical certification form certifying the existence of a serious health condition that prevents the employee from working. The certification form must be completed by a licensed physician, at the employee's expense. This form will enable Lee to determine whether the employee's disability qualifies for benefits under this program. An employee must remain under a doctor's care for the duration of benefits. Employees must provide medical certification of their continuing disability monthly, or more or less frequently, as specifically required by the human resources department. Any such recertification is also at the employee's expense.

5. **Benefit Exclusions.** Injuries or illnesses that are work-related, self-inflicted, or the result of the commission of a crime are not covered under this policy. No benefit will be provided to employees filing a claim based on any such injury or illness. Benefits under this program are also not available when an employee's absence is the result of a cosmetic or elective surgery unless medical complications arise during such surgery resulting in a secondary medical condition that would otherwise qualify the employee for benefits.
6. **Amount and Duration of Benefits.** Benefits under this program will not be paid until all required forms are received and processed by Human Resources. Income replacement will be reduced dollar for dollar by any other disability payments an employee receives. Benefits are paid on an eligible employee's base salary and do not include bonuses. Short term disability benefits replace your weekly earnings and are paid on the following schedule:

Full Years of Service (as of date of disability)	Income Replacement Employee Receives	Length of Benefit (after waiting period)
At least 1 year – Less than 3 years	100% of pay 60% of pay	Up to 4 weeks 5-8 weeks
At least 3 years – Less than 5 years	100% of pay 60% of pay	Up to 6 weeks 7-12 weeks
At least 5 years – Less than 10 years	100% of pay 75% of pay 60% of pay	Up to 6 weeks 7-12 weeks 13-20 weeks
10 or more years	100% of pay 75% of pay	Up to 10 weeks 11-20 weeks

7. **Return to Work.** Employees are required to return to work as soon as they are allowed to by their doctors. Employees who are released to return to work on a limited basis or with certain restrictions are required to do so in order to remain eligible for benefits under this policy. Failure to return to work as authorized will result in discontinuation of benefits under this program. We will make every effort to help the employee return to work with such restrictions. We will supplement an employee's income who returns to work on a reduced schedule for the time period and up to the percentages detailed in this policy.
8. **Multiple Absences/Disability Recurrence.** If an employee's disability requires additional absences after the employee has returned to work, the waiting period is waived for the second absence if:
 - a. it is the result of the same disabling condition as the first absence; AND
 - b. is within 90 days of the employee's return to work from the first absence.

In such a case, the waiting period will be waived.

In the case of any multiple claim under this policy within a 12 month period, the second claim will be considered a continuation of the first claim for income replacement eligibility. For example, if an employee with 1 year of service received benefits under this policy for 4 weeks, replacing 100% of income, any subsequent claim within 12 months from the first claim will be eligible for income replacement at 60% of income for up to four weeks.

Employees can collect a maximum of up to 20 weeks of short term disability benefits in a 12 month period under this policy, regardless of the cause of the claim or claims, based on the employee's length of service. We use a rolling 12 month period, which means that we will look back 12 months from the date any benefit under this policy would begin to determine your eligibility.

9. **Family and Medical Leave.** An employee's absence due to an illness or injury that qualifies as a serious health condition under the Family and Medical Leave Act (FMLA), will be counted towards the employee's 12-weeks of leave allowable under FMLA. Lee uses a rolling 12-month look-back period to determine the amount of FMLA leave available. This means that we will look back 12 months from the date of any requested leave to determine if any leave time had been taken during that 12-month period of time. If time had been taken during that period, it will reduce the amount of leave you are entitled to for this leave. Please see the FMLA policy in this handbook. Your eligibility for benefits under this program is not contingent upon your qualification for a leave of absence under FMLA. Likewise, eligibility for an FMLA leave of absence does not automatically qualify you for benefits under this STD program.
10. **Available Paid Leave.** Employees are required to use available paid leave at any point when their salary continuation drops below 100%, unless prohibited by state law.
11. **Pregnancy.** Disabilities arising from pregnancy, childbirth, or complications arising from childbirth shall be treated the same as any other illness which prevents an employee from working.
12. **Part Time Employees.** Short term disability benefits for part time employees are based on the average weekly hours worked over the twelve month period preceding the disability leave. If an employee has not been in part time status for twelve months, then the amount of time they have been in part time status will be used to determine their average weekly hours worked for income replacement purposes.
13. **Commissioned Sales Employees.** Short term disability benefits for commissioned sales representatives are based on the average weekly earnings of the employee in the twelve month period preceding the disability leave. A commissioned sales employee's income replacement while on disability leave will be reduced by the amount of commission, if any, earned during the period of disability. If an employee has not earned commission-based wages for twelve months, then the length of time they have earned a commission-based wage will be used to determine average income.
14. **Long Term Disability.** After five months of disability, an employee may be eligible for Long Term Disability plan payments as outlined in the Lee Enterprises Long Term Disability Plan. Please check with Human Resources or the Long Term Disability Summary Plan Description for more information.
15. **Failure to Return to Work.** An employee who receives benefits under this policy and fails to return to work for reasons other than the continuation of the disability shall be responsible for reimbursing any insurance premium paid by Lee Enterprises on behalf of the employee while on disability leave.

Lee maintains sole discretionary authority to determine both eligibility and benefits and to interpret and enforce any and all provisions of this program.

EMPLOYEE ASSISTANCE PROGRAM

A wide range of problems such as marital or family distress, drug and alcohol abuse, financial problems, and grief can be a disruption in your life and may affect your job performance. Our employee assistance program provides consultation services and referrals to local sources. All employees and their families are encouraged to use this free program. Employee visits to the employee assistance program are held in confidence to the maximum possible extent.

PAYROLL INFORMATION

COMPENSATION

It is the company's goal to maintain compensation for our employees at levels that attract and retain qualified people who can and will contribute effectively to the attainment of company objectives. Each job is assigned to a pay range determined by wage and salary surveys and various economic data. Depending on the job, we compete for personnel with other employers locally, regionally and nationally and survey data comparisons are made accordingly. The compensation plan is reviewed periodically to ensure that the plan is competitive and up to date.

PAY DAYS

If your scheduled pay day is a legal holiday, your check will be distributed on the previous day. You are encouraged to take advantage of direct deposit of your payroll check into a personal checking and/or savings account. For information on direct deposit and how to enroll or make a change to your direct deposit information, log onto our employee website, LINK, at link.lee.net.

PAYROLL DEDUCTIONS

With each check there is a detachable stub that shows total pay credited to you and the various deductions. Employees who have elected direct deposit will also receive this information. As required by law, the following taxes are deducted from your pay to the extent applicable:

- Federal income tax
- State income tax
- FICA and FMHI (Social Security and Medicare)

If eligible, you may authorize deductions for group medical, dental, vision, life insurance, employee stock purchase plan, retirement account plan, flexible spending accounts, charitable donations and subscription fees.

EMPLOYEE PAYMENT POLICY

It is the Company's policy and practice to accurately compensate employees and to do so in compliance with all applicable state and federal laws.

Review Your Pay Stub

The Company makes every effort to ensure our employees are paid correctly. Occasionally, however, inadvertent mistakes can happen. When mistakes do happen and are called to our attention, we will promptly make any corrections necessary. Please review your pay stub when you receive it to make sure it is correct. If you believe a mistake has occurred, or you have any questions please use the reporting procedure outlined below.

To Report Concerns or Obtain More Information

If you have any questions about omissions or deductions from your pay, please contact your Human Resources Manager. If you believe you have been subject to any improper deductions or your pay does not accurately reflect your hours worked you should immediately report the matter to your supervisor. If the supervisor is unavailable or if you believe it would be inappropriate to contact that person, you should immediately contact the Human Resources Manager, or any other supervisor in the company with whom you feel comfortable. If you are unsure of who to contact if you have not received a satisfactory response within five business days after reporting the incident, please immediately contact Lee enterprises at 1-877-LEE-4YOU.

Every report will be fully investigated and corrective action will be taken where appropriate, up to and including discharge for any employee(s) who violate this policy. In addition, the Company will not allow any form of retaliation against individuals who report alleged violations of this policy or who cooperate in our investigation of such reports. Retaliation is unacceptable, and any form of retaliation in violation of this policy will result in disciplinary action, up to and including discharge.

Arizona Daily Star

RELATIONSHIP BETWEEN STAR AND TNI AND CITIZEN

Three separate and distinct companies call 4850 S. Park Ave. home.

Star Publishing, publisher of the Arizona Daily Star, is owned by Lee Enterprises of Davenport, Iowa.

Citizen Publishing, publisher of the Tucson Citizen, is owned by Gannett Corp. Inc., headquartered in McLean, Va.

Tucson Newspapers is owned by Lee and Gannett equally. You'll also hear Tucson Newspapers called TNI, TNI Partners and Tucson's Newspapers.

All three companies are represented at regular Tucson Newspapers' board meetings along with corporate representatives of the two owners. This board sets budgets, approves new products and authorizes capital equipment purchases and is comprised of two Lee executives, two Gannett executives, the Star publisher and the Citizen publisher.

Each newsroom sets its own editorial policy as well as news gathering and newsroom practices. The three companies establish their own pay ranges.

The Star's publisher, the Citizen's publisher and Tucson Newspapers' president and vice presidents meet weekly as the Operating Committee. The OC, as it's commonly called, focuses on the common interests of the three companies. It is here that financials, circulation, advertising and other budget matters are discussed. Day-to-day problems are solved. Press starting times, safety issues, emergency evacuation plans and parking lot changes are a few of the issues decided here.

THE JOA

In 1940, The Arizona Daily Star and the Tucson Citizen entered into a joint operating agreement (JOA) that combined all mechanical and business functions of both newspapers. This JOA was one of the first in the country. Albuquerque's was the first. Later more than 20 JOAs were formed to preserve local news and editorial competition. Seattle, St. Louis, Detroit and Denver are a few of the cities in which newspapers have operated this way.

Under the terms of Tucson's JOA, a business agency — Tucson Newspapers — was formed to handle all business operations for the Star and the Citizen. Each paper owns half of the agency. In the 1960s the owner of the Citizen exercised a clause in the JOA to buy the Star. The U.S. Justice Department's antitrust department challenged the purchase. That challenge and a related investigation led the government to file a lawsuit alleging that the Tucson JOA (and by implication all other JOAs across the country) violated antitrust law. A trial was held in the 1960s in Tucson, and both the JOA and the acquisition were nullified. The U.S. Supreme Court upheld the decision. While the litigation proceeded, newspaper publishers and owners sought relief in Congress, saying that an adverse decision in Tucson would cause their communities to lose an editorial voice. The lobbying was successful and the Newspaper Preservation Act was signed into law in 1970. The law overturned the Supreme Court decision and reinstated the Tucson JOA. In December 1989, Pulitzer and Gannett signed a new joint operating agreement, the second 25-year renewal since 1940. It expires in 2015.

TUCSON NEWSPAPERS

The existing 265,000-square-foot building is constructed on two levels. The upper level houses the Star and Citizen in separate wings. Also on the upper level are all Tucson Newspapers' Operations departments (prepress, plate-making, press, distribution center and computer rooms), Circulation, Marketing, Administration, the Health and Strength Center and an independently run cafeteria. The lower level houses the Advertising, Finance, Facilities and Customer Services and Human Resources departments.

The building, parking areas and grounds cover 19 acres.

The Star has the following news-only offices
Downtown - 110 S. Church Ave., Suite 1497
Northwest - 3295 W. Ina Road, Suite 125
Police Station - 270 N. Stone Ave
River - 1640 E. River Road (a news and advertising office)

Tucson Newspapers' web sites:

Intranet — <http://tuc.gci>
Telephone directory — <http://tuc.gci/phonebook.php>

WORKPLACE POLICIES AND INFORMATION

PUBLICATION DATES

Advertising materials (including coupons) and other inserts for our newspapers usually arrive or are printed before publication dates. These materials are sent to us with the understanding and the trust that they will remain confidential until they are distributed to the general public.

PERSONAL BUSINESS/SALES

Collections for non-profit efforts such as through walk-a-thons, etc., may be conducted during breaks and lunch times. These efforts, however, should not disrupt nor distract from the performance of work responsibilities. You are welcome to post a flier on the Star's bulletin board at the main office.

Sales or business not related to the workplace may not be conducted in the building. Employees may not conduct business by phone or receive visitors for purposes other than Star business. You should not distract other employees from their work with personal business information. The workplace is for conducting business of the employer and not for conducting business for personal gain.

From time to time, however, employee craft fairs and "swap meets" may be organized on company property. Items may be sold at these events for personal gain, but the events may not distract any employees from their work. Participation must be on your own time. These will be held in non-work areas.

Any questions about these procedures should be addressed to your department head.

MAIL HANDLING

All U.S. mail and other overnight packages are delivered to the remote mail site adjacent to the back Star's entrance. All mail will be opened at this location. Personal mail should be sent to your home address; otherwise it will be opened before it is delivered to your mailbox.

READERS

Each and every reader is our customer. And each and every reader is important to the Star. You may not have the answers to a reader's questions, but chances are good that someone in the building does. It is our goal to assist the reader and to provide answers to his or her question. The best way to take care of a reader is to ask for the reader's name and phone number and track down the solution. With a solution in hand, call the reader with the resolution or with the name and phone number of the person who can address the reader's concern. Only transfer the reader to people you know can address his or her concerns. A reader should only be transferred once: to the person who can truly address or solve the problem. Answer phones and e-mails promptly and always be courteous.

BUILDING AND GROUNDS

EMERGENCY PLAN

In the event of an emergency at the main plant, the person who discovers it must call Security at extension 4444 or call the environmental coordinator at extension 4106.

At the sound of the alarm or other alert, all employees must evacuate and proceed immediately to the designated rendezvous location and remain there until further instructions. Newsroom employees should meet at the northeast corner of the visitor parking lot near the main entrance on Park Avenue. StarNet employees who work near the Cafeteria should meet in the southwest corner of the Citizen parking lot.

Department heads are responsible for evacuation of their employees. Special attention should be given to those who are disabled or need assistance. As a department head passes a restroom, he or she should open the door and ask if anyone is there. If someone responds, let that person know that an alarm sounded and everyone must leave the building. The same should be done with any office with a closed door. Outside, a head count will be made to determine if all department employees are out of the building. You may not re-enter the building until told to by a security officer or your department head.

HAZARDS

It is your responsibility to report any hazards or potential hazards to your safety representative, department head, Human Resources or Security.

The company abides by all hazardous-chemical regulations. Full copies of the emergency plan and hazardous-chemical plan are available from the environmental coordinator at extension 4106.

PARKING

Full-time employees are assigned parking spaces in the north lot by the newsroom's administrative assistant. All spaces marked with numbers are reserved. Parking spaces are limited, so park in your assigned parking space. Each employee receives a numbered windshield sticker, which must be placed inside the front windshield, lower left side. Part-time employees, temporary employees and employees who work at branch offices must park at the west end near the water tower in any space that is not numbered. Questions concerning parking should be directed first to the administrative assistant, then to Security.

Employees who are required to pay for parking while on company business should request a receipt to submit for reimbursement.

SECURITY

Because Tucson Newspapers is open 24 hours a day, special security measures are taken to protect employees and to prevent disruptions.

Visitors are required to register at the Security Desk in the main lobby. If you are expecting a visitor, please notify Security in advance.

All employees receive an ID badge, which is to be worn in the building at all times. The card is assigned to you exclusively; it may not be used by anyone else. This card is needed to gain access to building and property. You should never allow anyone not wearing a badge or unknown to you into the building.

If you lose your card, you must report it as soon as possible to Security. There may be a fee to replace it.

The building security system is designed for your safety. Questions about the system should be addressed to Security or Human Resources.

Employees are expected to maintain their individual work areas in uncluttered, clean and neat conditions in compliance with OSHA and company requirements. When you leave work each day, files should be locked and all work and materials, particularly those of a confidential nature, should be put away securely. The company cannot be responsible for personal items that employees bring to work.

You should use "common sense" to safeguard yourself and your personal belongings:

- Do not bring valuables to work.
- Keep your purse and/or belongings in a locked area, if you have one.
- Report any missing items to your supervisor at once.

SMOKE-FREE ENVIRONMENT

The Smoke-Free Arizona Act prohibits smoking in most enclosed public places and places of employment to ensure that those entering are not exposed to secondhand smoke. This new law requires that all outdoor smoking receptacles be placed at least **20 feet away** from all doors, windows and ventilation systems. The Arizona Department of Health Services (ADHS) is responsible for overseeing this program and the Pima County Health Department is responsible for educating employers on the requirements of the law, and to enforce the rules and regulations of the Smoke Free Arizona Act.

While we are currently a smoke-free building and the following actions are in place to be in compliance and avoid violations and penalties:

- Inform current and prospective employees at the Arizona Daily Star, Tucson Citizen and TNI about the Smoke-Free Arizona law and the company's smoking policy;
- Relocate ashtrays and other smoking receptacles from non-smoking areas to the new designated smoking areas;
- Prohibit anyone from smoking inside the place of business, **including all entrances and entryways, in the central courtyard, the cafeteria patio and in all company-owned vehicles;**
- Prohibit anyone including employees, vendors and customers from smoking outside within twenty feet (20') of entrances, windows, and ventilation systems;
- Post "No Smoking" signs or decals at every entrance that include ADHS contact information: 1-877-429-6676 or www.smokefreearizona.org. at a height and location easily readable from five feet (5') by an individual entering the building so that the signs are not obscured in any way. All business vehicles will have decals that are visible to each vehicle occupant.

This policy applies to all branch offices of Tucson's Newspapers, the Star and Citizen. The policy is in effect 24 hours a day, seven days a week.

BULLETIN BOARDS

Federal and state laws require that certain information be posted on employee bulletin boards. This information and other notices of interest are posted throughout the building.

Check the bulletin boards regularly to learn about job opportunities and employee activities. Employees may not post personal items on bulletin boards outside the Star newsroom without the approval of Human Resources.

An employee “Swap Board” is in the hallway outside the Cafeteria. It is for employee use only and provides a means for selling personal items. Human Resources must approve the notices before they are posted.

EMPLOYMENT INFORMATION

SUBSTANCE ABUSE POLICY

As part of our commitment to safeguarding the health of employees and providing a safe place for employees to work, we are issuing this policy outlining our position on the use or abuse of drugs and other controlled substances by employees and establishing a program to detect users and remove abusers of drugs and other controlled substances. Employer is committed to preventing the use and/or presence of controlled substances in the workplace.

Employer prohibits the manufacture, distribution, dispensation, presence, or use of alcohol, drugs and other controlled substances on its property or worksites. A limited exception exists for the reasonable consumption and possession of alcohol at company sponsored functions, when approved by the company. Employees violating this prohibition will be subject to immediate termination.

Employees taking an over-the-counter or prescription drug that may affect work performance must report this information to their Supervisor. Employer may relieve the employee of work duties if the use of the drug is deemed likely to impair the employee's faculties or work performance. An employee who appears to be impaired during work hours will not be allowed to work, regardless of the cause. All prescription drugs and over-the-counter drugs must be kept in the container in which they were received from the pharmacy or store. For purposes of this policy, the term "controlled substance" includes, but is not limited to, the use of prescription drugs without the appropriate prescription or use other than as prescribed.

An employee who is convicted of, pleads guilty or nolo contendere to a drug or alcohol related violation must inform employer management within five (5) days of such conviction or plea. Failure to provide the required notification will result in discipline, up to and including termination of employment. Upon reporting the conviction or plea, employer will review the circumstances and determine what discipline shall occur, up to and including termination.

An employee's violation of this policy may result in a reduction of benefit programs such as workers compensation benefits.

Employer uses drug and alcohol testing to help administer and enforce this policy. The following types of testing are used:

- a. All applicants offered a position are tested
- b. Employees are tested for reasonable suspicion
- c. Workplace accident testing
- d. Employees are tested where required by state or federal law
- e. Employees are tested when returning from rehabilitation

(1) Applicants – Subsequent to a job offer, an applicant will be asked to submit to a drug test. Failure to submit to such a test will result in a revocation of the job offer.

(2) Reasonable Suspicion Testing — Current employees can be asked to submit to a drug and/or alcohol test if reasonable suspicion exists to indicate that their health or ability to perform work might be impaired. Factors that could establish cause include, but are not limited to:

- a. Sudden changes in work performance;
- b. Repeated failure to follow instructions or operating procedures;

- c. Violation of company safety policies;
- d. Involvement in an accident or near-accident;
- e. Discovery or presence of illegal or suspicious substances or materials in an employee's possession or near the employee's workplace;
- f. Odor and/or residual odor peculiar to some chemical or controlled substances;
- g. Unexplained and/or frequent absenteeism;
- h. Personality changes or disorientation; and
- i. Reports, anonymous or otherwise, of drug or alcohol use.

(3) Workplace Accident Testing – Employees may be tested for the presence of drugs or alcohol in their system following an accident in the workplace if the accident caused:

- bodily injury or death;
- injury to an employee requiring filing of a report or record under the Occupational Safety and Health Act (OSHA); or
- property damage estimated to be greater than \$1,000

(4) State or Federal Requirements — Employees must submit to drug and/or alcohol testing when required by federal or state law, regulation, or by contractual obligation not otherwise anticipated by the provisions of this policy. If other drug or alcohol testing is required, every effort is made to coordinate new testing requirements with employer's drug testing provisions.

(5) Return-to-Service/Post-Rehabilitation Testing — Employees who return to service after an extended period of time away from employment with employer must submit to drug and/or alcohol testing. Additionally, employees who have been referred to rehabilitation by employer are tested before they return to the job and may be subject to additional testing as part of their return to work agreement.

Test and Post-Test Procedures

- a. All testing is done by a lab chosen by employer. Controlled substance screening detects the following: marijuana metabolites, cocaine metabolites, amphetamines (including methamphetamine), opiates, and phencyclidine.
- b. If an initial drug test is positive, a confirmation test is performed on the same specimen.
- c. Once selected for a test under this policy, employees must sign a Chemical Screening Consent and Release Form. Employees who refuse to sign the form and/or submit to the test will be terminated.
- d. If the physician, official, or lab worker has a reasonable suspicion that the employee has tampered with the specimen, the employee will be terminated.
- e. All results are kept confidential. Employees with negative test results may continue working. A confirmed positive test results in termination, unless the employee elects and qualifies for the rehabilitation as explained below.
- f. Alternatively, employees with a confirmed positive test can, at their option and expense, have a second confirmation test made on the same specimen. An employee is not allowed to submit another specimen for testing.
- g. An employee awaiting test results can be placed on probationary status and sent home without pay during the time required for a specimen to be evaluated.
- h. An alcohol concentration of .04 or higher, expressed in terms of grams of alcohol per two hundred ten liters of breath, or its equivalent, is considered a positive alcohol test result and violates this policy.

Disciplinary Action

Any employee engaging in the use of drugs or any other controlled substance while on company property, while on a company worksite, or while on company business or who reports for duty under the effects of alcohol or any other controlled substance will be removed from the workplace, required to undergo testing, and upon receipt of a positive test, will be terminated. An employee may avoid termination if the employee qualifies for and elects to participate in rehabilitation, as explained below.

Rehabilitation

An employee who has violated this Substance Abuse policy may undergo rehabilitation, treatment, or counseling programs and retain employment with employer when the following conditions are met:

- The employee has not previously violated employer's Substance Abuse Policy
- The employee's work performance is otherwise satisfactory, to be determined at the sole discretion of the employer
- The employee has not damaged company property or injured himself or a employer employee
- The employee agrees to fully cooperate with all rehabilitation requirements

When the above conditions are met, no adverse employment action will be taken against the employee based on the positive drug or alcohol test, so long as the employee complies with the requirements of rehabilitation and successfully completes rehabilitation. Requirements of rehabilitation include, but are not limited to, the following: (1) The employee must contact the Employee Assistance Program within 14 days of the date of written notice of a positive test, (2) The employee must sign a release of information to allow the EAP substance abuse professional to notify the employer of employee's compliance with the rehabilitation program, and (3) upon return to work, the employee must submit to a drug and/or alcohol test. Employer will not subsidize any costs of such rehabilitation or treatment, beyond any subsidy a group health insurance policy, if any, provides.

Miscellaneous Matters

Employer's Substance Abuse Policy primarily governs company actions in the area of drugs, alcohol and other controlled substances. Other company policies can be applicable in this area to the extent they do not conflict with this policy. No part of this policy or its procedures is intended to affect employer's right to manage its workplace or discipline its employees, or to guarantee employment, continued employment, or terms or conditions of employment to any individual. The Substance Abuse Policy and procedures in no way creates an obligation or contract of employment. Employer reserves the right to alter or amend the program at any time at its sole discretion. If any part of this policy is determined to be void or unenforceable under state or federal law, the remainder of the policy, to the extent possible, remains in full force and effect.

DRESS CODE

Our company strives to be known as a place where employees enjoy their work environment while creating extraordinary results. To support our culture of excellence, it is very important you are well groomed, and dress appropriately for your job. While we trust each employee's common sense and good judgment, the clarification below might help you consistently determine what is appropriate for our work environment.

1. Employees are expected at all times to present a professional, businesslike image to customers, prospects, and the public. Acceptable personal appearance, like proper maintenance of work areas, is an ongoing requirement.
2. Employees are expected to dress in a manner that is normally acceptable in similar business establishments.
3. Radical departures from conventional business attire are not acceptable.

Occasionally employees are invited to dress in a more casual fashion than is normally required, such as on designated casual days. On these occasions, employees are still expected to present a neat appearance and are not permitted to wear ripped or disheveled clothing, athletic wear, or similarly inappropriate clothing.

EXPENSE REPORTS

The Star will reimburse you for many of the expenses you incur while on assignment.

You will receive mileage reimbursement for business travel. You will be reimbursed for your travel costs while you are on assignment out of town. If it is more than a one-day trip, the Star will pay for food and lodging. In town, the Star will pay for business-related meals. You are expected to be reasonable about your expenses.

All expenses, including mileage, must be itemized and supported by an original receipt. Credit statements and photocopies of receipts are not acceptable unless no other proof of purchase is available. Original receipts include cash register printouts, customer copy of itemized restaurant charges, an itemized hotel bill, car rental contract and airline ticket receipts. Purchases made via the Internet should be documented with a printout of product description and charges from the vendor web site.

Also, a record is necessary of not only the amount of money spent on business related matters but who was present, and the date, place and purpose of the meeting. These are Internal Revenue Service requirements.

You must sign your expense report and submit it to your department head or assistant managing editor for approval. Approved reports must be submitted to the Director of Administration by 5 p.m. Friday's for reimbursement the following Thursday. Reports should be filed weekly. Expenses incurred in one month must be submitted by the end of the following month or they will not be reimbursed.

If you need an advance for extraordinary expenses, such as a trip out of town, submit a request-for-check form. If you need emergency money, the Director of Administration and the managing editor maintain petty-cash boxes.

BENEFITS

FUNERAL LEAVE

When a death occurs in your immediate family, you may receive up to three working days off, with pay, to attend the funeral. Funeral leave should be arranged with your supervisor.

The immediate family includes parents, spouse, domestic partner, children, sisters, brothers, mother-in-law and father-in-law, step-family members and the employee's grandparents.

Time off without pay may also be granted, on approval from your supervisor, to attend the funeral of other close relatives. If preferred, such absence will be charged against your available vacation.

HOLIDAYS

Employees are granted the following "full-day" paid holidays each calendar year:

New Year's Day	January 1
Memorial Day	Last Monday in May
Independence Day	July 4
Labor Day	First Monday in September
Thanksgiving Day	Fourth Thursday in November
Christmas Day	December 25th
Two Flex Days	

With the exception of staff, who normally work on weekends, when a holiday falls on a Saturday, it will be observed on the preceding Friday. When the holiday falls on a Sunday; it will be observed on the following Monday.

Any employee who is absent without authorized paid leave on either the last scheduled workday immediately preceding a holiday or the first scheduled work day after a holiday, shall not receive pay for the holiday.

Part-time employees scheduled to work 20 or more hours per week shall receive holiday pay on a pro-rated basis.

JURY DUTY

When called for jury duty, you should immediately inform your supervisor. You will be given leave from your duties for the time you are required to be in court and will receive your regular pay from Lee Enterprises for up to 30 days. Should your jury duty exceed 30 days, contact your Publisher. You may keep the pay you receive from the courts for serving on the jury to offset such needs as parking and food. Because you will be receiving your regular pay, you are expected to return to work if the jury duty is completed prior to the end of your working hours, unless instructed otherwise by your supervisor.

SICK PAY

It is important to keep yourself healthy and on the job. Employees shall receive up to five days of paid sick leave each fiscal year for those days that they are unable to work due to an illness. Part-time employees scheduled to work 20 or more hours per week shall receive sick days on a pro-rated basis.

The number of paid sick leave hours awarded is calculated as follows:

- FT employees - 8 hours of paid sick leave per day
- RPT employees - 6 hours of paid sick leave per day
- PT20+ employees - 4 hours paid sick leave per day

Sick leave is provided for the exclusive purpose of allowing employees to take time off for their own incapacitating illness or injury, or for the illness or injury of a dependent residing within their household. Visits to doctors and dentists for the employee or the employee's dependents are also acceptable reasons for taking sick leave. If you are absent for more than three consecutive business days due to an illness you may be required to obtain a physician's statement to return to work.

Employees who know in advance that they will be absent for health reasons must give their supervisors advance notice. In the case of a sudden illness, employees should notify their supervisor as soon as possible before their scheduled start time. If the employee is too ill to place the call, a relative or other responsible adult can place the call. Please note that failure to give proper advance notice of an absence due to illness may result in discipline, up to and including termination.

Sick days must be used in the same fiscal year they are received. Unused sick days cannot be rolled into the following fiscal year or paid out in cash. Employees hired after January 1 of the current fiscal year shall receive paid sick leave at a rate of one day for every 2.4 months of employment.

Employees absent because of their own or certain family members' serious health conditions might be eligible for leave under the Family and Medical Leave Act. Employees who desire more information about FMLA leave should consult Lee's FMLA Leave Policy or contact the Human Resources Department. Any available sick pay will be applied concurrently to Family and Medical Leave when taken for your own health condition or disability.

VACATION

Lee Enterprises wishes to acknowledge and reward continued employment by awarding vacation time to full-time employees. Part-time employees who work at least 20 hours per week are also eligible for vacation awards on a pro-rated basis.

The number of vacation hours awarded is based on your status on the award date and is calculated as follows:

- FT employees - 8 hours of vacation per number of days eligible
- RPT employees - 6 hours of vacation per number of days eligible.
- PT20+ employees - 4 hours of vacation per number of days eligible.

Vacation time is awarded on March 1 and August 1 of each fiscal year. The amount of vacation time that will be awarded depends upon the employee's length of service with Lee on January 1 of the fiscal year it is awarded, as detailed in the table below. Employees must be actively employed on the award date. Employees hired after January 1 will received vacation on a prorated basis.

Length of Service as of October 1	Vacation Time
Under 5 years	Employees are eligible to receive 2 weeks of vacation in the fiscal year. Employees shall receive 1 week of vacation on March 1 and 1 week on August 1.
5 – 10 years	Employees are eligible to receive 3 weeks of vacation in the fiscal year. Employees shall receive 1 ½ (7 ½ days) weeks on March 1 and 1 ½ weeks on August 1.
More than 10 years	Employees are eligible to receive 4 weeks of vacation in the fiscal year. Employees shall receive 2 weeks of vacation on March 1 and 2 weeks of vacation on August 1.

Vacation time may not be carried over to the following fiscal year and must be used in the fiscal year that it is awarded. Consequently, employees who believe they will be eligible for a vacation award may “borrow” vacation time. Employees may not, however, borrow more vacation than they expect to be awarded in the fiscal year. A vacation award that is not used in the fiscal year it is awarded will be forfeited. A vacation award may not be “cashed out” in lieu of taking the vacation time.

Employees who do not expect to be employed on an award date should not borrow vacation. Vacation time that has been borrowed but not yet awarded may, where permitted by state law, be deducted from an employee’s final paycheck. Any unused vacation award is forfeited at the time of termination.

Vacation time should be planned in advance with your supervisor. Every effort will be made to accommodate each request. Please keep in mind, however, that your request for vacation at a particular time may be denied due to the needs of the company.

Employees must use awarded vacation to substitute unpaid leave under the Family and Medical Leave Act.

Example 1: Sally wishes to take a two-week vacation in March. Sally has been employed by Lee for three years and is eligible to receive one week of vacation in March and another week in August. She has not used any vacation time in the fiscal year, and she plans to stay with Lee throughout the fiscal year. Sally borrows one week of vacation and receives one week of paid vacation on March 1; with this, she is able to receive pay for her two-week vacation in March. Sally does in fact remain employed through the fiscal year and her borrowed time is “paid off” with her one week vacation award in August.

Example 2: Sam intends to retire in June. Sam should not borrow any more vacation than what he is awarded on March 1, as he will not be eligible for a vacation award on August 1.

Example 3: Bill is a Regular Part-Time Employee (30-39 hours per week). Each day of vacation he is awarded under this policy is a 6-hour day. Sara is a Part-Time 20 Employee (20-29 hours per week). Each day of vacation she is awarded under this policy is a 4-hour day.

OTHER BENEFITS

CLASSIFIED ADS

You may place personal classified ads in the Arizona Daily Star at half price. This discount does not apply to advertising a personal business or service.

CREDIT UNION

Participation in the Southern Arizona Communications Credit Union (SACCU) is available to all full and part-time employees and their families. The credit union is in the main lobby. Savings and payment of loans to the credit union may be made through payroll deduction. Other services and discounts also are provided. Employees can open an account after paying a one time joining fee of \$1 and are required to keep a minimum balance of \$25. The credit union is open Monday through Thursday from 10 a.m. to 4 p.m. and Friday from 10 a.m. to 5 p.m. and closed each day from 1 to 2 p.m. for lunch. The operation of the credit union is separate from Tucson's Newspapers, and any questions regarding savings, loans and other services should be directed to the credit union, 573-4436.

HEALTH AND STRENGTH CENTER

All employees and their family members or domestic partners, age 18 and older, are eligible to join the Health and Strength Center on the day of hire. The one-time membership fee is \$20 per person and provides access to the center and to the nearby locker rooms. The ongoing membership fee is \$1.50 a week through payroll deduction. Contact Human Resources to sign up. The center, which is available to members 24 hours a day, seven days a week, is off the hallway next to the Production Administration Office and near the Packaging Center.

LIBRARY

The Arizona Daily Star Library is a private library for employees to use in their work. It should not be used for personal research. Its holdings include microfilmed copies of the Star back to 1877, as well as clip files dating from the 1940s. Work since October 1993 is accessible from the online archive.

The library has Arizona telephone books and newspapers, city directories, magazines and University of Arizona directories. The library also has a considerable book and pamphlet collection. Back issues of the Star and Tucson Citizen are available.

The photo library includes photos, negatives and electronic images from Star photographers, as well as wire services. These items are indexed by subject matter, personal names, date taken and photographer.

The library is a self-service operation. Employees are asked to check out materials they remove from the library for use in the building. No library materials may be removed from the building. A tour of the library is part of each new employee's orientation. Refresher tours may be requested.

NEWSPAPER SUBSCRIPTION

You may subscribe to the Arizona Daily Star through payroll deductions. You will receive the newspaper delivered to your home seven days a week or on e-Edition for 50% of the regular price. Please contact Human Resources for more information and appropriate forms.

TUITION REIMBURSEMENT

The Star supports professional development by offering a limited tuition-reimbursement program to assist employees to further their careers by taking courses, workshops and seminars that assist them in their jobs. Overall funds for this program may be limited. All full-time employees are eligible. The course, workshop or seminar must be applicable to the employee's job. The study must be done on your time. Prior to enrollment in a class, the department head must obtain the executive editor's approval. After obtaining approval, you pay the tuition and enroll in the class. After satisfactorily completing the class, submit proof of passing and the receipt for tuition. This information is submitted to your department head, who submits it for reimbursement.

To receive reimbursement, you must earn a passing grade (C) or better. The maximum that can be spent on an employee in a calendar year is \$750. An employee's request may be denied due to budgeting restrictions or for any reason.

ACKNOWLEDGEMENT OF RECEIPT OF HANDBOOK

I hereby acknowledge I have received an electronic copy of Lee Enterprises' Employee Handbook. I understand that the policies and procedures set forth in the handbook are not an express or implied contractual guarantee regarding my employment relationship with Lee Enterprises nor do they represent contractual terms of employment. I understand that it is my responsibility to carefully review the employee handbook and ask my supervisor or the Human Resources Manager about any of the material that is unclear to me. I also understand that Lee Enterprises, at its option, may change, delete, suspend or discontinue any part or parts of this handbook at any time without advance notice. I also understand that updates are incorporated into this handbook and I can print a current copy of the handbook from LINK (link.lee.net).

This handbook is applicable to all employees. No one other than the enterprise operating executive or operating vice president may alter or modify any of the policies in the handbook. Any such alteration or modification must be in writing and signed by the operating vice president or operating enterprise executive.

This handbook replaces all previous handbooks for Lee Enterprises as of April 1, 2009. Similarly, any future revisions of the handbook will replace the prior versions of the handbook.

I have read this acknowledgement. I further understand and agree that my employment relationship is for no definite duration and my employment may be terminated at any time for any reason or no reason at all at the option of either Lee Enterprises or myself.

Employee Name (Please print)

Signature of Employee

Date

Print and return to Human Resources Manager signed and dated within the first week of employment.