

**KCPT  
PUBLIC TELEVISION 19, INC.**

**WHISTLEBLOWER POLICY**  
*(Effective as of October 13, 2009)*

Public Television 19, Inc. (“KCPT”) requires that each member of KCPT’s Board of Directors (the “Board”), officer and employee of KCPT (collectively, “Team Members”) observe high standards of business and personal ethics in the conduct of each Team Member’s duties and responsibilities. Each Team Member must practice honesty and integrity in fulfilling his or her responsibilities and comply with all applicable laws and regulations. To this end, the Board has adopted this Whistleblower Policy (this “Policy”) to (i) provide an avenue for Team Members to report violations or suspected violations of the law, and (ii) provide reassurance that Team Members will be protected from reprisals or retaliation for whistleblowing in good faith. This Policy replaces all previous whistleblower policies of KCPT and shall be effective as of the date set forth above.

**Section 1.     Scope**

This Policy applies to all Team Members of KCPT, including part-time, temporary, and contract employees.

**Section 2.     Purpose**

This Policy is intended to cover material concerns that could have a significant impact on KCPT, such as actions that:

- May lead to incorrect financial reporting;
- Are unlawful;
- Are not in line with KCPT’s policies; or
- Constitute some other improper conduct.

**Section 3.     Reporting Responsibility**

It is the responsibility of each Team member to comply with the law and to report violations or suspected violations of the law in a timely fashion in accordance with this Policy.

**Section 4.     No Retaliation**

No Team Member who in good faith reports a violation or suspected violation of the law shall suffer harassment, retaliation, or adverse employment consequences. A Team Member who retaliates against someone who has reported a violation or suspected violation of the law in good faith may be subject to discipline up to and including termination of employment. This Policy is intended to encourage and enable Team Members to raise serious concerns within KCPT prior to seeking resolution outside KCPT.

## **Section 5. Reporting Violations**

KCPT follows an open door policy and suggests that Team Members share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, a Team Member's supervisor is in the best position to address an area of concern. However, if a Team Member is not comfortable with reporting to his or her supervisor, or is not satisfied with the supervisor's response, the Team Member is encouraged to speak with anyone in management whom he or she is comfortable approaching. Supervisors and managers are required to report suspected fraud or violations of the law to the Chairman of the Audit Committee, who has responsibility to investigate all reported violations of the law. When a Team Member is not satisfied with or is uncomfortable with KCPT's open door policy, he or she should contact the Chairman of the Audit Committee directly.

If a Team Member is not comfortable with reporting (i) a violation or suspected violation of the law, or (ii) a suspected retaliation violation using any of the methods described in the preceding paragraph, the Team Member may report such matters using any of the methods provided for below:

### **Hotline Communications**

A toll-free number, 1-800-507-7322, administered by National Educational Telecommunications Association, an independent third party to report complaints anonymously and confidentially.

### **E-mail Communications**

#### **Kcptconfidentialaccess@netaonline.org**

A general e-mail address administered by an independent third party to report complaints anonymously and confidentially.

#### **KCPTchairmanoftheauditcommittee@netaonline.org**

Direct e-mail communication with the Chairman of the Audit Committee, who is a non-employee director. The e-mail address of the Chairman of the Audit Committee is under his or her complete control; however, there is no guarantee of anonymity by using this e-mail address.

### **Regular Mail**

KCPT Public Broadcasting 19, Inc.  
Attn: Chairman of the Audit Committee  
125 East Thirty-First Street  
Kansas City, Missouri 64108  
Phone: (816) 756-3580

## **Section 6. Accounting and Auditing Matters**

The Audit Committee must address all concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The Chairman of the Audit Committee must

immediately notify the entire Audit Committee of any such complaint and work with the Audit Committee until the matter is resolved.

**Section 7.     Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of the law by KCPT or a Team Member must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the law. Any allegations that prove to have been made maliciously or knowingly to be false may result in disciplinary or legal action, including the punishments outlined in Section 10.0 of this Policy.

**Section 8.     Confidentiality**

Reports of KCPT or Team Member violations or suspected violations of the law will be kept confidential to the extent permitted by law and consistent with the need to conduct an adequate investigation.

**Section 9.     Handling of Reported Violations**

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. Some concerns may be resolved by agreed action without the need for investigation.

**Section 10.    Policy Violations**

We take the provisions of this Policy very seriously, and we will treat any violations of the Policy accordingly. A failure by any Team Member to comply with this Policy may result in prompt disciplinary action up to and including suspension or termination of employment. KCPT will not be obligated to reimburse Team Members for any fines or legal costs incurred by them or on their behalf.

**Section 11.    Policy Shall be Publicly Available**

This Policy, and any amendments or supplements hereto, shall always be available on KCPT's website at [www.kcpt.org](http://www.kcpt.org).