

WHISTLEBLOWER POLICY

Public Television 19, Inc. (“Kansas City PBS”) requires that each member of Kansas City PBS Board of Directors (the “Board”), officer and employee of Kansas City PBS (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 must comply with all applicable laws and regulations. To this end, this Whistleblower Policy (this “Policy”) is intended to (i) provide an avenue for Team Members to report actual or suspected serious misconduct that violates the laws or regulations that govern Kansas City PBS operations, and (ii) provide reassurance that Team Members will be protected from reprisals or retaliation for reporting such actual or suspected serious misconduct in good faith.

Section 1. Scope

This Policy applies to all Team Members of Kansas City PBS, including part-time, and temporary employees and contractors.

Section 2. Purpose

This Policy is intended to cover serious misconduct that could have a significant impact on Kansas City PBS. “Serious misconduct” includes but is not limited to actions that:

- Relate to accounting practices, internal controls, auditing or that may lead to incorrect financial reporting;
- Are dishonest or fraudulent;
- Violate Kansas City PBS Rules of Conduct, conflict of interest, and/or similar policies; or
- Constitute some other illegal or unethical conduct.

Section 3. Reporting Responsibility

It is the responsibility of each Team Member to comply with the law and to report serious misconduct in a timely fashion in accordance with this Policy.

Section 4. No Retaliation

No Team Member who in good faith reports serious misconduct shall be subject to harassment, retaliation, or adverse employment consequences because of his/her report. A Team Member who retaliates against someone who has made a good faith report of serious misconduct under this Policy may be subject to discipline up to and including termination of employment. This Policy is intended to encourage and enable Team Members to raise concerns of serious misconduct within Kansas City PBS prior to seeking resolution outside Kansas City PBS.

Section 5. Reporting Violations

Kansas City PBS 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 instances, a Team Member's supervisor and/or Human Resources is in the best position to address a workplace concern. However, if the concern involves serious misconduct and the Team Member is not comfortable with reporting such serious misconduct to his or her supervisor and/or Human Resources, or is not satisfied with the response of the immediate supervisor and/or Human Resources, the Team Member is encouraged to speak with any member in management with whom he or she is comfortable. Supervisors and managers are required to report suspected fraud or suspected violations of the law to the Chairman of the Audit Committee, who has responsibility to investigate such reports.

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

E-mail Communications

Kansas City PBSChairmanoftheauditcommittee@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.

Kcptconfidentialaccess@netaonline.org

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

Regular Mail

Kansas City PBS
Attn: Chairman of the Audit Committee
125 East Thirty-First Street
Kansas City, Missouri 64108
Phone: (816) 756-3580

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.

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 serious misconduct by Kansas City PBS 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 Kansas City PBS or Team Member serious misconduct will be kept confidential to the extent permitted by law and consistent with the need to conduct an adequate investigation and to take any warranted remedial action.

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

Kansas City PBS takes 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 termination of employment. Kansas City PBS will not 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 Kansas City PBS website at www.kansascitypbs.org.