

FT EDITORIAL CODE OF PRACTICE

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1. Introduction

- 1.1 It is fundamental to the integrity and success of the titles published by The Financial Times Limited (FT) that the company upholds the highest possible professional and ethical standards of journalism, and is seen to do so.
- 1.2 This places a responsibility on every FT editorial employee and contributor to conduct her/himself according to practices which reinforce the FT's reputation for accuracy, truthfulness, honesty and authority.
- 1.3 As a publisher of leading international business titles, we have a particular responsibility to set the highest standards of practice in financial journalism. It is essential that FT titles should have unfettered editorial freedom within the Code and the law, and that they would be (and be seen to be) free from proprietorial interference in editorial content. It is also vital that no one at the FT should undertake any activity that could possibly leave them or the FT open to allegations of having used their position for personal profit or any kind of undue market manipulation.
- 1.4 FT employees and contributors must follow this code of practice in their work. This code (along with the general principles of media law) apply equally to writing for our print titles, websites including FT.com, blogging, and contributing to social networking sites such as Twitter and Facebook, whenever employees and editorial contributors present themselves in their capacity as FT journalists or contributors. The Code must be followed fully in spirit, as well as to the letter. Anyone in any doubt about an issue concerning their conduct should refer it to the Editor or Deputy Editor of the relevant FT title, or where applicable, their relevant Commissioning Editor or team leader.
- 1.5 Failure by an FT employee to abide by the Code may result in disciplinary action, including dismissal.
- 1.6 The FT's general ethical standards, set out below, are aimed at protecting the rights of individuals and organisations, and also the public's right to know.
- 1.7 They should not be interpreted so narrowly as to compromise the FT's commitment to respect the rights of individuals and organisations, nor so broadly that they constitute

an unnecessary interference with freedom of expression or prevent publication in the public interest.

2. IPSO's Editors' Code of Practice

- 2.1 FT editorial employees and freelance contributors must comply with IPSO's Editors' Code of Practice, a copy of which is set out in Annex 1.

3. FT Complaints Commissioner

- 3.1 In the event of a complaint being referred to the FT's Complaints Commissioner about an alleged breach of the standards set out in this Code, FT editorial employees and freelance contributors must cooperate and comply with the lawful enquiries and requirements of the Commissioner.

4. FT Financial Journalism & Disclosure Requirements: Summary

- 4.1 FT employees and freelance contributors:
- (a) (even where the law does not prohibit it) must not use for their own profit, financial information they receive in advance of its general publication, nor should they pass such information to others; and
 - (b) must not write about, or make editorial decisions about, shares or other financial instruments (including for example units in funds, bonds and derivatives (including commodity derivatives)) in whose performance they know that they or certain relatives have a financial interest, without disclosing the interest to their Editor or Managing Editor (see further, below).

Compliance with FSMA Financial Promotion regime

Background

- 4.2 Under the UK Financial Services and Markets Act 2000 (**FSMA**), it is a criminal offence to communicate an invitation or inducement to engage in investment activity (a "financial promotion") unless, broadly, the person making the communication is authorised under FSMA or the content has been approved by an authorised person or an exemption applies.
- 4.3 The financial promotion regime is capable of applying to the FT and to its various titles, employees and freelance contributors. This may be the case if, for example, an article makes an express recommendation to buy or sell a particular investment. Even if there is not an express recommendation, an article referring to an investment or its issuer may nevertheless be an inducement to buy or sell an investment.
- 4.4 Since the FT is not authorised under FSMA (nor is it likely that its employees or freelance contributors will be authorised), it is necessary to rely on an exemption for articles which contain financial promotions. There is a broad exemption for financial journalism. However, its application is more restrictive if the article relates to shares

or derivatives relating to shares (options, futures and contracts for differences on shares).

Disclosure and editorial decision

4.5 Accordingly, the author must – before copy deadline – notify by email the relevant FT title’s Editor or Deputy Editor about any interest he or a member of his family has in any relevant investment covered in editorial content that is submitted for publication, with a view to:

- (a) an entry being made in the relevant confidential FT Investment Register; and
- (b) decisions being made as to whether:
 - (i) it would be appropriate for a disclosure of the relevant interests to be made in the published content itself (which is required where the author or a member of his family is likely to obtain a financial benefit or avoid a financial loss if people act in accordance with the relevant invitation or inducement); or
 - (ii) in the particular circumstances, it would simply be inappropriate for the content to be published.

4.6 For these purposes:

- (a) “**author**” means both the writer who has devised the proposed editorial content and the commissioning editor who is responsible for deciding to include the content in the relevant FT title;
- (b) “**member of his family**” means the author’s spouse or civil partner and any children of his under the age of 18 years; and
- (c) “**relevant investment**” means any shares or stock in share capital (whether or not listed) and derivatives relating to such shares – i.e. options, futures and swaps and other contracts for differences. “Shares”, for these purposes, do not include shares in an open-ended investment company but do include shares in a closed-ended investment company. If you are in any doubt as to whether any relevant investment in a fund is a “share”, you should disclose your interest.

4.7 The relevant FT Investment Register will be subject to regular internal review.

Compliance with the EU Market Abuse Regulation 2014

Background

4.8 This regulation applies where editorial content submitted for publication: (i) contains information that explicitly or implicitly recommends the buying, selling, subscribing for or the underwriting of a financial instrument or the exercise of any right conferred

by a financial instrument to buy, sell, subscribe for or underwrite it; or (ii) offers any opinion as to the present or future value or price of these financial instruments.

- 4.9 Where the regulation applies, it requires the relevant recommendation to be fairly presented and for financial interests or conflicts of interest to be disclosed.

Disclosure of interests etc.

- 4.10 Accordingly, the author must – before copy deadline – notify by email the relevant FT title’s Editor or Deputy Editor about any relationship or circumstance that may reasonably be expected to impair his objectivity in producing any recommendation relating to financial instruments in editorial content that is submitted for publication, with a view to:

- (a) an entry being made in the relevant confidential FT Investment Register; and
- (b) a decision being made as to whether:
 - (i) it would be appropriate for a disclosure of the relevant relationship or circumstance to be made in the published content itself; or
 - (ii) in the particular circumstances, it would simply be inappropriate for the content to be published.

- 4.11 For these purposes:

- (a) a “relationship” or a “circumstance that may reasonably be expected to impair objectivity” include where the author (or any person working with or for him) has an interest or conflicts of interests relating to):
 - (i) the financial instrument which is the subject of the recommendation or
 - (ii) an issuer of a financial instrument to which the recommendation (directly or indirectly) relates (for example where the author or one of his family members is a director of the issuer);

These interests or conflicts of interests should include those of any person closely associated with the author (e.g. a member of his family or companies or trusts controlled by the author).

- (b) “financial instrument” means any financial instrument admitted to trading in the European Economic Area (‘EEA’) or for which a request for admission has been made - including, broadly, any EEA-listed share, bond, warrant, derivative (including options, futures, swaps and other contracts for differences) or exchange traded fund.

Fair presentation

- 4.12 The author of any investment recommendation in editorial content that is submitted for publication must ensure that in that recommendation (to the extent applicable):
- (a) facts are clearly distinguished from interpretations, estimates, opinions and other types of non-factual information;
 - (b) all the documents, figures, names and other records used are reliable and if there is any doubt as to their reliability that this is clearly indicated;
 - (c) all projections, forecasts and price targets are clearly labelled as such and that any material assumptions made in producing or using them are indicated;
 - (d) substantially material sources of information are clearly indicated; and
 - (e) the meaning of any recommendation made, such as the recommendations to “buy”, “sell” or “hold” is sufficiently clear.
- 4.13 FT publications containing any recommendation must clearly and prominently disclose that journalists are subject to the FT’s Editorial Code of Practice.
- 4.14 If the author owns a net long or short position exceeding the threshold of 0.5% of the total issued share capital of the issuer, that must be disclosed.

General obligation to complete Investment Register

- 4.15 In addition to any specific disclosure obligation set out above, all FT editorial employees and freelance contributors that are FT ‘SuperStringers’, ‘Stringers’ or ‘Retained Contributors’ must in any event complete an entry in the relevant **Investment Register** to record all investments of the types specified below that are held by such individuals. Only the FT titles’ Editors, Deputy Editors, Managing Editors, Deputy Managing Editors and FT’s complaints commissioner and oversight panel will have access to the complete registers.
- 4.16 Even if such an individual holds no relevant investments, this must be recorded. Such individuals must update their entry promptly whenever a relevant change in their investments occurs.
- 4.17 Specific investments that should be declared include:
- (a) Shares of UK and overseas companies, public and private (including shares held through PEPs and ISAs);
 - (b) bonds and other debt securities (including Islamic bonds);
 - (c) warrants;

- (d) certificates representing any of the foregoing;
 - (e) shares or other units in collective investment products (i.e. investment funds whether open ended or closed ended such as investment trusts, unit trusts and open-ended investment companies); and
 - (f) options, futures and swaps and other contracts for differences (e.g. spread bets)
- 4.18 Those using advisory or discretionary brokers or managers to manage their money should detail their holdings as of their last portfolio statement.
- 4.19 The following are **excluded** from the declaration requirements:
- (a) any details about the value of your investments;
 - (b) Insurance policies;
 - (c) Gilts; and
 - (d) (as regards this particular section of the FT Code) holdings by members of your family.

5. Recording Telephone Conversations

- 5.1 Telephone conversations should not be recorded unless all parties to the conversation give consent.* (**see below**)
- 5.2 This applies to editorial employees and contributors in the UK and elsewhere in the world.
- 5.3 Employees and contributors should use shorthand to take a note of telephone conversations.
- 5.4 Employees who feel their shorthand is not up to speed should request shorthand training, which is provided by FT to staff free of charge.
- 5.5 If all parties consent to a particular telephone conversation being recorded, the recording may be sent by FT employees to an approved third party for transcription.
- 5.6 Any recording must be kept safe and secure, and should not be retained without being deleted for any longer than is necessary for the relevant journalistic purposes.
- 5.7 This policy is based primarily on the FT's view of best ethical practice. It is also formulated having regard to the provisions of Ss.1, 2(2) & 2(8) of the UK's Regulation of Investigatory Powers Act 2000, which in some circumstances (e.g. depending on the telephone network and type of recording device used) make the non-consensual recording of a telephone conversation a criminal offence and, in others, a civil wrong.
- 5.8 Offences such as conspiring to commit / aiding and abetting misconduct in a public office

(* **Exceptional cases:** In certain exceptional circumstances, for example in relation to certain investigative journalism in the public interest, it may be acceptable to record a telephone conversation without consent for journalistic purposes. However, employees and contributors must not do so without first having obtained clearance from FT in-house legal counsel and either the Editor or Deputy Editor of the relevant FT title.)

6. Offences Generally

6.1 It goes without saying that no FT employee or contributor should commit any criminal offence in relation to journalism or any other matter.

6.2 There are various criminal offences in the UK (and of course elsewhere) which relate to the obtaining, and to the publication, of certain information. For example, employees and contributors should familiarise themselves with the following UK criminal prohibitions:

- (a) Ss. 1 & 2 Regulation of Investigatory Powers Act 2000 (phone hacking)
- (b) S.1 Computer Misuse Act 1990 (computer hacking)
- (c) S.55 Data Protection Act 1998 (e.g. in relation to obtaining/disclosing personal data)
- (d) Ss.1, 2, 6 & 7 Bribery Act 2010 (bribery)
- (e) S.2 Contempt of Court Act 1981 (in relation to any publication that creates a substantial risk that the course of justice in ‘active’ proceedings will be seriously impeded or prejudiced)
- (f) Breach of court reporting restrictions

6.3 In the event of any doubts regarding the provenance or lawfulness of any information, or of any journalistic activity involved in obtaining information, FT employees and contributors that are FT ‘SuperStringers’, ‘Stringers’ and ‘Retained Contributors’ should seek advice from FT in-house legal counsel before taking any relevant steps or including that information for publication; other types of freelance editorial contributors should raise such matters in advance with their FT Commissioning Editor, who should in turn seek advice from in-house counsel. If you receive a complaint relating to any FT content, you must immediately alert the Editor or Deputy Editor of the relevant FT title, and/or in-house counsel. No agreement should be reached or commitments made to complainants without prior approval from the relevant Editor or Deputy Editor.

7. Sourcing and Attribution

7.1 As a general rule of thumb, we require at least two independent sources for each story. Editorial employees should familiarise themselves with the FT Sourcing and Attribution Policy, which can be found on the [FT intranet](#).

7.2 Editorial employees and contributors must not plagiarise others' work. That is, they must not knowingly pass-off others' work as their own: if the essence or a substantial part of another's work is knowingly included in material to be published by FT, sufficient acknowledgement of the original author and/or publisher should be provided. (In assessing whether any plagiarism has occurred, regard may be had to all the circumstances, including a person's state of mind; the extent of any apparent copying or derivation; and, the nature of any original, and subsequent, work. It is recognised that the facts and subject matter of current or historical events may be public-domain details that are legitimately available to be reported by different authors and news organisations in their own right. Principles of fairness and common sense should be applied.)

8. FT Speakers Register

8.1 FT editorial employees (as well as contributors that are FT 'SuperStringers', 'Stringers', or 'Retained Contributors') who are making a speech or conference appearance that commands a fee and/or where another party is paying your travel costs must notify the Managing Editor, Editor or Deputy Editor of the relevant FT title in advance by email (see below) so that an appropriate entry may be made in the FT Speakers' Register.

8.2 For this purpose, please email speakers.editorial@ft.com

8.3 You must disclose the nature of the event, the fee and whether you give a donation to charity. You do not need to provide any such notification in relation to unpaid events such as speeches at universities or NGOs.

8.4 The information will be held in the Managing Editor's office. Transparency in this regard is intended to help avoid potential conflicts of interest.

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(cont.)

**ANNEX 1 – THE EDITORS’ CODE OF PRACTICE OF THE INDEPENDENT PRESS
STANDARDS ORGANISATION (IPSO)**

Please note that for the purposes of the FT Editorial Code of Practice:

- References to IPSO and the regulator in IPSO’s Editors’ Code below shall be deemed to be references to the FT Complaints Commissioner.
- Section 13 of the Code below (Financial Journalism) is supplemented by the additional sections on financial journalism in the FT Editorial Code of Practice.

This box of text has been added by the Financial Times, and does not form part of IPSO’s Editors’ Code.

Preamble

The Code – including this preamble and the public interest exceptions below – sets the framework for the highest professional standards that members of the press subscribing to the Independent Press Standards Organisation have undertaken to maintain. It is the cornerstone of the system of voluntary self-regulation to which they have made a binding contractual commitment. It balances both the rights of the individual and the public’s right to know.

To achieve that balance, it is essential that an agreed Code be honoured not only to the letter, but in the full spirit. It should be interpreted neither so narrowly as to compromise the commitment to respect the rights of the individual, nor so broadly that it infringes the fundamental right to freedom of expression – such as to inform, to be partisan, to challenge, shock, be satirical and to entertain – or prevents publication in the public interest.

It is the responsibility of editors and publishers to apply the Code to editorial material in both printed and online versions of their publications. They should take care to ensure it is observed rigorously by all editorial staff and external contributors, including non-journalists.

Editors must maintain in-house procedures to resolve complaints swiftly and, where required to do so, co-operate with IPSO. A publication subject to an adverse adjudication must publish it in full and with due prominence, as required by IPSO.

1. Accuracy

- 1.1 The Press must take care not to publish inaccurate, misleading or distorted information or images, including headlines not supported by the text.
- 1.2 A significant inaccuracy, misleading statement or distortion must be corrected, promptly and with due prominence, and - where appropriate - an apology published. In cases involving IPSO, due prominence should be as required by the regulator.
- 1.3 A fair opportunity to reply to significant inaccuracies should be given, when reasonably called for.
- 1.4 The Press, while free to editorialise and campaign, must distinguish clearly between comment, conjecture and fact.

- 1.5 A publication must report fairly and accurately the outcome of an action for defamation to which it has been a party, unless an agreed settlement states otherwise, or an agreed statement is published.

2. * Privacy

- 2.1 Everyone is entitled to respect for his or her private and family life, home, health and correspondence, including digital communications.
- 2.2 Editors will be expected to justify intrusions into any individual's private life without consent. In considering an individual's reasonable expectation of privacy, account will be taken of the complainant's own public disclosures of information and the extent to which the material complained about is already in the public domain or will become so.
- 2.3 It is unacceptable to photograph individuals, without their consent, in public or private places where there is a reasonable expectation of privacy.

3. * Harassment

- 3.1 Journalists must not engage in intimidation, harassment or persistent pursuit.
- 3.2 They must not persist in questioning, telephoning, pursuing or photographing individuals once asked to desist; nor remain on their property when asked to leave and must not follow them. If requested, they must identify themselves and whom they represent.
- 3.3 Editors must ensure these principles are observed by those working for them and take care not to use non-compliant material from other sources.

4. Intrusion into grief or shock

- 4.1 In cases involving personal grief or shock, enquiries and approaches must be made with sympathy and discretion and publication handled sensitively. These provisions should not restrict the right to report legal proceedings.

5. * Reporting suicide

- 5.1 When reporting suicide, to prevent simulative acts care should be taken to avoid excessive detail of the method used, while taking into account the media's right to report legal proceedings.

6. * Children

- 6.1 All pupils should be free to complete their time at school without unnecessary intrusion.
- 6.2 They must not be approached or photographed at school without permission of the school authorities.
- 6.3 Children under 16 must not be interviewed or photographed on issues involving their own or another child's welfare unless a custodial parent or similarly responsible adult consents.

- 6.4 Children under 16 must not be paid for material involving their welfare, nor parents or guardians for material about their children or wards, unless it is clearly in the child's interest.
- 6.5 Editors must not use the fame, notoriety or position of a parent or guardian as sole justification for publishing details of a child's private life.

7. * Children in sex cases

- 7.1 The press must not, even if legally free to do so, identify children under 16 who are victims or witnesses in cases involving sex offences.
- 7.2 In any press report of a case involving a sexual offence against a child – (i) The child must not be identified. (ii) The adult may be identified. (iii) The word “incest” must not be used where a child victim might be identified. (iv) Care must be taken that nothing in the report implies the relationship between the accused and the child.

8. * Hospitals

- 8.1 Journalists must identify themselves and obtain permission from a responsible executive before entering non-public areas of hospitals or similar institutions to pursue enquiries.
- 8.2 The restrictions on intruding into privacy are particularly relevant to enquiries about individuals in hospitals or similar institutions.

9. * Reporting of Crime

- 9.1 Relatives or friends of persons convicted or accused of crime should not generally be identified without their consent, unless they are genuinely relevant to the story.
- 9.2 Particular regard should be paid to the potentially vulnerable position of children who witness, or are victims of, crime. This should not restrict the right to report legal proceedings.
- 9.3 Editors should generally avoid naming children under the age of 18 after arrest for a criminal offence but before they appear in a youth court unless they can show that the individual's name is already in the public domain, or that the individual (or, if they are under 16, a custodial parent or similarly responsible adult) has given their consent. This does not restrict the right to name juveniles who appear in a crown court, or whose anonymity is lifted.

10. * Clandestine devices and subterfuge

- 10.1 The press must not seek to obtain or publish material acquired by using hidden cameras or clandestine listening devices; or by intercepting private or mobile telephone calls, messages or emails; or by the unauthorised removal of documents or photographs; or by accessing digitally-held information without consent.
- 10.2 Engaging in misrepresentation or subterfuge, including by agents or intermediaries, can generally be justified only in the public interest and then only when the material cannot be obtained by other means.

11. Victims of sexual assault

- 11.1 The press must not identify or publish material likely to lead to the identification of a victim of sexual assault unless there is adequate justification and they are legally free to do so.

12. Discrimination

- 12.1 The press must avoid prejudicial or pejorative reference to an individual's race, colour, religion, sex, gender identity, sexual orientation or to any physical or mental illness or disability.
- 12.2 Details of an individual's race, colour, religion, gender identity, sexual orientation, physical or mental illness or disability must be avoided unless genuinely relevant to the story.

13. Financial journalism

- 13.1 Even where the law does not prohibit it, journalists must not use for their own profit financial information they receive in advance of its general publication, nor should they pass such information to others.
- 13.2 They must not write about shares or securities in whose performance they know that they or their close families have a significant financial interest without disclosing the interest to the editor or financial editor.
- 13.3 They must not buy or sell, either directly or through nominees or agents, shares or securities about which they have written recently or about which they intend to write in the near future.

14. Confidential sources

- 14.1 Journalists have a moral obligation to protect confidential sources of information.

15. Witness payments in criminal trials

- 15.1 No payment or offer of payment to a witness - or any person who may reasonably be expected to be called as a witness - should be made in any case once proceedings are active as defined by the Contempt of Court Act 1981. This prohibition lasts until the suspect has been freed unconditionally by police without charge or bail or the proceedings are otherwise discontinued; or has entered a guilty plea to the court; or, in the event of a not guilty plea, the court has announced its verdict.
- 15.2 * Where proceedings are not yet active but are likely and foreseeable, editors must not make or offer payment to any person who may reasonably be expected to be called as a witness, unless the information concerned ought demonstrably to be published in the public interest and there is an over-riding need to make or promise payment for this to be done; and all reasonable steps have been taken to ensure no financial dealings influence the evidence those witnesses give. In no circumstances should such payment be conditional on the outcome of a trial.
- 15.3 * Any payment or offer of payment made to a person later cited to give evidence in proceedings must be disclosed to the prosecution and defence. The witness must be advised of this requirement.

16. * Payment to criminals

- 16.1 Payment or offers of payment for stories, pictures or information, which seek to exploit a particular crime or to glorify or glamorise crime in general, must not be made directly or via agents to convicted or confessed criminals or to their associates – who may include family, friends and colleagues.
- 16.2 Editors invoking the public interest to justify payment or offers would need to demonstrate that there was good reason to believe the public interest would be served. If, despite payment, no public interest emerged, then the material should not be published.

THE PUBLIC INTEREST:

There may be exceptions to the clauses marked * where they can be demonstrated to be in the public interest.

1. The public interest includes, but is not confined to:
 - i. Detecting or exposing crime, or the threat of crime, or serious impropriety.
 - ii. Protecting public health or safety.
 - iii. Protecting the public from being misled by an action or statement of an individual or organisation.
 - iv. Disclosing a person or organisation's failure or likely failure to comply with any obligation to which they are subject.
 - v. Disclosing a miscarriage of justice.
 - vi. Raising or contributing to a matter of public debate, including serious cases of impropriety, unethical conduct or incompetence concerning the public.
 - vii. Disclosing concealment, or likely concealment, of any of the above.
2. There is a public interest in freedom of expression itself.
3. The regulator will consider the extent to which material is already in the public domain or will become so.
4. Editors invoking the public interest will need to demonstrate that they reasonably believed publication – or journalistic activity taken with a view to publication – would both serve, and be proportionate to, the public interest and explain how they reached that decision at the time.
5. An exceptional public interest would need to be demonstrated to over-ride the normally paramount interests of children under 16.