

Sun-Times Media Group, Inc.
"Whistleblower Procedures"

Sun-Times Media Group, Inc. with its subsidiaries and affiliates, including the Sun-Times News Group (herein referred to as the "Company"), is committed to providing its employees with a work environment that promotes: honest and ethical conduct; full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission and in other public communications made by the Company; and, compliance with all applicable governmental laws, rules and regulations.

The Company strongly encourages employees to report any misconduct that they become aware of in the course of their employment or otherwise connected to their employment. Although it is impossible to list all of the conduct the Company is concerned about, employees are expected to report:

- criminal conduct;
- financial irregularity
- discrimination
- harassment
- document falsification
- theft
- substance abuse
- legal and policy violations
- actions that endanger health or safety, or might cause environmental damage; and
- actions designed to have the effect of concealing any of the foregoing.

In support of this commitment, the Company has established the following procedures for confidential, anonymous submissions of concerns regarding possible misconduct by employees and for the receipt, retention and treatment of complaints relating to such conduct:

1. Accounting Concerns. The Company's policy is to comply with all financial reporting and accounting regulations applicable to the Company. If any employee or member of the Board of Directors (the "Board") of the Company has concerns regarding questionable accounting or auditing matters of the Company, then he or she is asked to address those concerns initially with those officers, managers or employees responsible for the matter in question. If no satisfactory resolution of the concern can be achieved directly, or if the employee or member of the Board otherwise is concerned about repercussion or retaliation, then he or she is encouraged to submit those concerns (anonymously, confidentially or otherwise) through the EthicsPoint hotline via the internet at www.STNGethics.com, www.STMGethics.com or www.EthicsPoint.com. A toll free hotline, 1-866-654-6517, is also available. Such submissions will be supervised by the Audit Committee of our Board of Directors, and investigations will be conducted by appropriate internal or external staff, depending on the nature of the concern.

2. Reporting Any Illegal or Unethical Behavior. Employees and members of the Board are encouraged to talk to supervisors, managers or other appropriate personnel about potentially illegal or unethical behavior. Employees and members of the Board who are concerned that illegal or unethical conduct has occurred or may occur should contact their supervisor, manager or other appropriate personnel about their concerns or complaints. They may also contact the Company's Law Department, or utilize the Company's secure hotline. If their concerns or complaints require confidentiality, including keeping their identity anonymous, then this confidentiality will be protected, subject to applicable law, regulation or legal proceedings.

3. Security Exchange Commission (SEC) Reporting. As a public company, it is of critical importance that Company filings with the SEC be accurate and timely. Depending on their position with the Company or its subsidiaries, an employee or member of the Board may be called upon to provide necessary information to assure that the Company's public reports are complete, fair and understandable. The Company expects employees and members of the Board to take this responsibility very seriously and to provide prompt accurate answers to inquiries related to the Company's public disclosure requirements. 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. Records should be retained or destroyed according to the Company's record retention policies. In the event of litigation or governmental investigation, the Company's Law Department must be advised forthwith, and no books or records relating to the matter in question should be destroyed.

4. Protection of the Whistleblower. It is the policy of the Company to not retaliate and not tolerate any retaliation, directly or indirectly, against anyone who, in good faith, makes an allegation or assists with an investigation. The Audit Committee will not reveal the identity of the person who makes a good faith report and who asks that his or her identity remain confidential and shall not tolerate any effort made by any other person to ascertain the identity of any person who makes a good faith report anonymously.

5. Concerns Regarding Anonymity. When reporting a concern, please provide as specific detail as possible, including back-up documentation where feasible, in order to permit adequate investigation of the concern or conduct reported. Vague, non-specific or unsupported allegations are more difficult to pursue and may not warrant the costs and effort necessary to adequately investigate them.

A person does not need absolute proof of misconduct to make a report, but the Company would expect that a reporting person have some basis for voicing his or her concerns. The Company understands that it will not always be clear that any particular action or situation represents misconduct or illegal conduct. The Company encourages employees and Board members to raise concerns and not keep them to themselves. If an individual makes a report in good faith and it turns out that the individual was wrong, his or her concern will be nonetheless appreciated and will not result in disciplinary action. However, if a report is intentionally false or malicious, that is another matter.

6. Procedures for Reporting. Employee concerns can be reported (anonymously, confidentially or otherwise) through the EthicsPoint hotline via the internet at www.STNGethics.com, www.STMGethics.com, or www.EthicsPoint.com or through the toll free hotline, 1-866-654-6517. Additionally, complaints may be reported to the Company's Law Department, Human Resources or Audit Department.