

WXPR Statement of Policy on Conflicts of Interest

The Station and its members have a shared interest in the use of the WXPR name and related insignias and images. The name of the station has been invested with value through the efforts of innumerable individuals through the years. It is an intellectual as well as a financial asset in which the members of the Station have a common stake. To protect that value, individual members are expected in their outside activities to observe the policy on the use of its name, insignias, and images.

WXPR has accordingly developed the following policies and guidelines with which all officers, staff, directors, community advisory board members and on-air volunteers (herein referred to as representatives) are expected to comply.

Fiduciary Responsibility

1. WXPR representatives serve our mission and have a clear obligation to conduct all affairs of the organization in an upright and honest manner. Each person should make necessary decisions using good judgment and ethical and moral considerations.
2. All decisions of WXPR representatives are to be made solely on the basis of a desire to promote the best interests of our mission.
3. In order to avoid any appearance of a conflict of interest, WXPR representatives agree to place the welfare of the organization above their own financial interests, or those of family members, or others who may be personally involved in the financial affairs of the organization.

Any circumstances which could cast doubt or even the appearance of doubt upon a representative's ability to act with total objectivity with regard to WXPR's interests presents a potential conflict of interest situation. Set forth below are the kinds of conflict situations each representative should avoid and guidelines for dealing with them. Any WXPR representative who has any question about whether a particular activity or transaction is permitted or prohibited by this policy statement should seek clarification from their immediate supervisor or the Chairman of the Board of Directors

1. **Self-Dealing Conflict.** The possibility of a self-dealing conflict typically occurs where a representative has a significant personal interest in a transaction to which WXPR is a party coupled with some degree of influence or control over the outcome.

2. **Conflict of Commitment.** This conflict arises where there may be, in fact an appearance of competing demands upon the time and energy of a representative as a result of his or her outside activities and interests which would interfere with the representative's ability to meet his or her responsibilities to WXPR.

3. **Inappropriate Use of Station Name or Station Resources.** A conflict may arise when a representative seeks to use WXPR's name or the Station's resources, such as its facilities or equipment, to advance his or her own private interests. WXPR's name, facilities, and equipment are to be used for the furtherance of Station goals and not for the benefit of, or to imply WXPR's support of, a non-Station activity.

- a. **Use of Station Name.** No representative shall use the official title of the Station, or any of its parts, in whatever form that title may appear except in connection with legitimate Station purposes. A representative may not use WXPR's name and address on stationery in connection with an outside organization that he or she established or of which he or she is a director unless the representative's participation in that organization is at the request of WXPR or is otherwise a part of the representative's normal Station duties.

b. Use of Station Facilities and Equipment. Station materials, supplies, facilities, or personnel must not be diverted by a representative to promote an outside activity or interest of his or her own. WXPR may grant permission to a representative in his or her pursuit of outside activities or interests or to an employee of another institution or entity to use Station facilities, but only under the following conditions: where there is evidence that the work of such a representative, supported by Station resources, will be of significant benefit to WXPR; where there is supervision of such work.

4. **Use of Confidential Information.** A conflict may occur between a representative's obligations to WXPR and his or her personal interests where there could be a misuse of privileged information for private gain. This conflict arises, for example, where a Station representative uses confidential information acquired in connection with his or her Station-related activities for personal gain or for other unauthorized purposes. A representative who transmits to others outside the legitimate Station circle confidential information obtained in the course of Station-sponsored activities is in breach of his or her duty of loyalty which demands use of such information for WXPR's credit and the benefit of its members.

Disclosure

WXPR representatives are expected to comply with WXPR's policy of disclosure and consultation where a conflict of interest could arise by: fully disclosing the precise nature of their interest or involvement when participating in any transaction of the organization in which another party to the transaction includes: himself or herself; a member of the family (spouse, parents, brothers, sisters, children, or any other immediate relative); or an organization with which the member of the Board or the staff or his or her family, is affiliated. Disclosure shall be made at the first knowledge of a transaction. WXPR representatives must report any significant changes in his or her outside activities that occur during the year, and by consulting with the Board Chairman or supervisor if the undertaking of a new outside professional activity is considered.

The Board of Directors of WXPR is available to any representative to provide advice on a confidential basis on any question of possible conflict of interest. Directors, or supervisors, being specifically charged with the duty of maintaining the integrity of the Station's standards are obliged to notify the President, of any significant violations of WXPR's policies on conflicts of interest. Compliance with these policies is essential if the primary goals of WXPR, its commitment to excellence in the realm of both broadcasting and community service, are to be achieved.