

WSRE TV FOUNDATION, INC.
CONFLICT OF INTEREST POLICY

It is the policy of the Board of Directors of the WSRE-TV Foundation, Inc., to properly disclose all conflicts of interest, whether by a board member, officer, or employee. The purpose of this policy is to establish the framework within which the Foundation wishes its business to operate and to provide general direction so that Board members, committee members, and employees can seek further clarification on issues related to the subject of acceptable standards of operation, the avoidance of potential conflicts of interest, and the disclosure of those that may occur.

Definition of Conflict of Interest

A conflict of interest arises when a board member, officer or employee has a personal interest that may influence him/her when making a decision for the organization. For the purpose of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the Board member, committee member, or employee is similar to that of persons who are related by blood or marriage.

Definition of Personal Gain

Personal gain may result not only in cases where a Board member, committee member, employee or relative has a significant ownership in a firm with which the Foundation or Pensacola State College does business, but also when a Board member, committee member, employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction of business dealings involving the Foundation or of Pensacola State College.

Disclosure of Actual or Potential Conflict of Interest

No presumption of guilt is created by the mere existence of a relationship with outside firms or entities. However, if a Board member, committee member, or employee has any influence on transactions involving purchases, contracts, or leases, it is imperative that he or she discloses this fact so that safeguards can be established to protect all parties. Board members, officers, and, as determined by the Board, other key employees or related parties will complete the Foundation Conflict of Interest Questionnaire annually. The Executive Committee of the Board of Directors shall review the responses and report to the Board any potential conflicts that should be noted for subsequent abstention and/or recusal from that Member/Officer/Employee's participation in related Foundation business. The Executive Director will retain the completed questionnaires.

**WSRE TV FOUNDATION, INC.
CONFLICT OF INTEREST QUESTIONNAIRE**

- | | Yes | No | Did you or any relative (as defined in the accompanying policy statement) at any time since July 1, 2008 either directly or indirectly: |
|----|------------|-----------|---|
| 1. | _____ | _____ | Have any personal financial interest in any transaction or series of transactions to which the Foundation or Pensacola State College was a party or in any currently proposed transaction or series of transactions to which the Foundation or Pensacola State College is to be a party? (If Yes, please describe below). |
| 2. | _____ | _____ | Serve as an officer, director, employee, or consultant or perform other managerial services for any business that sought to do business with the Foundation or Pensacola State College (other than as a donor of the Foundation)? (If Yes, please describe below). |
| 3. | _____ | _____ | Accept or solicit any personal payment of money or any gift, entertainment including meals, favor, discount or other personal benefit from any individual or business doing or seeking to do business with the Foundation or Pensacola State College that equaled or exceeded \$100 in value? (If Yes, please describe below). |
| 4. | _____ | _____ | Use, give or release data or information concerning the Foundation or Pensacola State College, its donors, suppliers or the recipients of its grants and services, to any person unless such information is publicly known, required, or in connection with Foundation or College business, or such disclosure is required by law. (If Yes, please describe below). |
| 5. | _____ | _____ | Become aware of any possible conflicts of interest that any other board members, officers, or employees may have? (If Yes, please describe below). |

<u>Question No.</u>	<u>Explanation and/or disclosure</u>

I have answered the above questions accurately and to the best of my knowledge.

(Name)

(Signature)

(Date)

Executive Committee Review: _____

(Signature of Board Chair)

(Date)