



Policies & Procedures

CONFLICT OF INTERESTS

(To the extent that anything in this Conflict of Interests policy is inconsistent with any other provision in RFA's policies, this Conflict of Interests policy will prevail.)

A. General

RFA's credibility and effectiveness as a news organization depend on the ability of its audience to trust that RFA programs—and the staff who create and support its broadcasting—are free from bias toward any political, social, ethnic, religious or financial interests. RFA's employees are expected to take scrupulous care to avoid any action or relationship, whether in or outside the workplace, and whether or not specifically prohibited by any RFA policy or procedure, which results in or is reasonably likely to create the appearance of:

- losing independence, impartiality, or honesty;
- using their status with RFA to promote personal interest or gain;
- giving inappropriately preferential treatment to any person;
- impeding the Company's efficiency or economy;
- making a decision on behalf of RFA outside of Company-sanctioned channels; or
- undermining the confidence of the public in the integrity of the Company.

Violation of this Conflict of Interests policy—including a failure to report existing or prospective activities or relationships that constitute or create the appearance of a conflict of interest—may result in disciplinary action including termination of employment.

B. Disclosure

RFA requires employees to obtain RFA's approval before engaging in outside activities that may potentially affect public perceptions—in or outside the Broadcast Area—of RFA's journalistic independence, ethical integrity and credibility. Activities that could constitute a conflict of interest include, but are not limited to, those of a business, financial, journalistic (including blogging), artistic, cultural, or political nature. The process for obtaining RFA's approval is as follows:

1. The employee submits a completed Disclosure Form to Human Resources. (Disclosure Forms are down-loadable from a link at the bottom of this policy.)
2. After logging in the employee's Disclosure Form, Human Resources delivers the Form, along with a blank Determination Form, to the appropriate determining officer (i.e., the VP of Programming for all employees in the Language Services or in Editorial, or the VP of Finance & Administration for all other employees; or, in either case, as otherwise designated by RFA's President.)
3. The determining officer consults with RFA's General Counsel (or designee) and completes the Determination Form. The determining officer returns the employee's Disclosure Form and the completed Determination Form to Human Resources.
4. Human Resources returns the completed Determination Form to the employee.

The Company reserves the right (1) to forbid an employee from engaging in any outside activity, paid or non-paid, that may be deemed harmful to the public trust upon which RFA's credibility and effectiveness are based, and (2) to revoke any permission previously given for any such outside activity.

In many instances, disclosure of an activity or relationship that may appear to be a conflict of interest can, by the mere fact of disclosure to the Company, eliminate any cause for concern. Confidential disclosure of a potential conflict of interest may be made on a standard form available from the Human Resources Department.

C. Guidelines

The following guidelines illustrate some common conflicts of interest but should not be regarded as comprehensive. The most basic rule governing conflicts of interest is: ***When in doubt, ask.***

1. Outside Activities

Many outside jobs are incompatible with the proper performance of work for a media company, like RFA, that prides itself on balance and objectivity. All employees should take care to avoid any outside work that could represent or appear to represent a conflict of interest. Because RFA is a media company, employees who are directly involved in the practice of the Company's journalism (including, but not limited to, reporters, editors, analysts, broadcasters, and Service Directors) may not work for any other

Last amended October 15, 2012

person or entity, or engage in outside journalistic activity (including blogging), without RFA's approval.

- a. All employees must obtain RFA's approval for outside journalistic work or activity (freelance or otherwise) if (a) the employee is reasonably likely to be identified or recognized as an RFA staffer; (b) the employee expects to use Company resources, including news information or archival materials; or (c) there is any reasonable doubt about the propriety of such work or activity under this Conflict of Interests policy. This rule applies regardless of whether the work is to be paid or non-paid.
- b. Freelance or outside work, journalistic or otherwise, may not be carried out during the employee's regularly scheduled working hours; must not encroach on the time, energies or attention that should be devoted to work performed for RFA; must not constitute a conflict of interest or the appearance of a conflict of interest; and must not undermine the confidence of the public in the integrity of the Company.
- c. In order to prevent the appearance of an association between RFA and other news organizations that would call into question RFA's independence and impartiality, the Company generally prohibits employees from freelancing or otherwise contributing to other media outlets whose content is disseminated in the Broadcast Area.
- d. With RFA's approval, employees may engage in outside work or activity involving writing, lecturing, and other public appearances; provided that such work or activity does not violate any RFA policy or procedure, including this Conflict of Interests policy. (For any outside media/press appearance or interview, the employee must also obtain all advance approvals required on the Media/Press Appearance Approval Form. This Form is down-loadable from a link at the bottom of this policy.)
- e. Any honoraria received for such approved appearances must be remitted to RFA if the appearance occurs on Company Time. "Company Time" is defined as (i) the employee's regularly scheduled working hours, excluding vacation and personal time, and (ii) any time spent by an employee at a conference, seminar, or other event to which the employee was sent by the Company or at which the employee is representing the Company.

2. Financial Relationships

Last amended October 15, 2012

- a. RFA expects its employees to avoid entering into any business or financial activity that entails or could appear to entail illegal or unethical conduct and that could as a result harm the reputation of the Company.
- b. Employees in a position to influence the financial decisions of RFA, and the spouses, parents, siblings, and children of such employees, may not have a direct or indirect financial interest in any business enterprise that supplies, purchases from or has other business relations with RFA; *provided*, however, that this prohibition does not apply to any investment representing less than the lesser of (i) 1% of the outstanding stock of a publicly held company or (ii) USD \$10,000 in value.
- c. If an employee of RFA has an investment prohibited by subsection C.2.b at the time he/she begins employment at RFA, he/she must disclose such investment and must then (i) liquidate such investment within 30 days of joining RFA, (ii) obtain a waiver from the General Counsel, or (iii) recuse himself/herself from all decisions at RFA involving the enterprise in which the employee has invested.
- d. Managers responsible for purchasing goods or services, or contracting with outside organizations, must disclose any relationship with an outside provider of goods or services prior to any commitment of RFA funds to that provider.
- e. In the event that a close relative (defined as spouse, sibling, child, parent, aunt, uncle, niece, nephew, or first cousin, in each case either by birth or marriage) of an RFA employee develops or plans a business relationship with RFA, the employee must notify the Vice President of Programming or the Vice President of Administration and Finance, as appropriate, about the relationship in writing. Close relatives of RFA employees are not prohibited from doing business with RFA, but no special advantage may result to the employee or relative in question from these relationships.
- f. Except as provided in Section C.3 (“Acceptance of Gifts or Favors”), employees are strictly prohibited from accepting for personal gain any money or other form of payment either from other employees or from freelance contributors and others outside the Company who provide goods and services to RFA.

- g. RFA strongly discourages employees from conducting financial business with other employees, including lending money and entering into joint business ventures.
- h. RFA also strongly discourages employees from participating in business arrangements or investments in the Broadcast Area that may give rise to the appearance of conflict of interest. Any such interests or investments must be disclosed to and approved by RFA in accordance with this policy.
- i. Managers are strictly prohibited from accepting gifts from their subordinates; *provided*, however, that on an occasional basis, including any occasion on which gifts are traditionally given or exchanged, the following may be accepted from a subordinate or other employee:
 - (i) items, other than cash, with an aggregate market value of USD 20 or less per occasion;
 - (ii) items such as food or refreshments to be shared in the office among several employees;
 - (iii) personal hospitality provided at a residence that is of a type and value customarily provided by the employee to personal friends; and
 - (iv) items given in connection with the receipt of personal hospitality if of a type and value customarily given on such occasions.

3. Acceptance of Gifts or Favors

- a. Employees may not accept any gift or favor with a value of USD 20 or more from, or present any such gift or favor to, any actual or potential news sources or anyone with whom RFA does business or may potentially do business. A favor is any personal benefit such as, but not limited to, a meal, a loan of money, free air transportation, or discounted prices on goods and services. These restrictions do not apply to token gifts or favors with a value of less than USD 20 ("Token Gifts or Favors"); provided that employees should only accept Token Gifts or Favors on an occasional basis.
- b. It is RFA policy not to accept free or discounted transportation or lodging or comparable favors from current or potential news sources or individuals or entities that are likely to be the subject of news reports. It is recognized that in some instances (including travel on Presidential aircraft) strict application of this policy may not be possible. Any exceptions must have RFA's approval.

- c. Gifts exceeding USD 20 in value given by political leaders, former political leaders, or “VIPs” at public ceremonies may be accepted by Company employees if protocol requires that they be accepted; provided, that any such gift exceeding USD 300 in value shall become the property of RFA, and not that of the individual to whom the gift was presented.

4. Political Activity and Foreign Affiliations

- a. While RFA encourages constructive activity in community organizations, it is essential that Company staff—especially those engaged in journalism—avoid the reality or appearance of association with organizations that (i) may have an interest in influencing the content of RFA programs; (ii) engage in partisan political activity in the Broadcast Area; (iii) seek to influence government policy or legislation in the Broadcast Area at any level, from local to national; or (iv) advocate policies that conflict with RFA's commitment to ethnic, racial, religious and social tolerance and harmony.
- b. Employees who are directly involved in the practice of the Company's journalism (including, but not limited to, reporters, editors, analysts, broadcasters, and Service Directors) may not run for, be appointed to, or serve in any political office in the Broadcast Area. Journalists at RFA may engage in such political activity outside the Broadcast Area only if (i) the political office is nonpartisan, (ii) the office is with a local or municipal body (*i.e.*, not at the state, provincial, federal, regional, national, or transnational level), *and* (iii) the journalist has received permission from his/her supervisor before running for such office or accepting appointment to such office.
- c. Employees must obtain RFA's approval before agreeing to perform any paid or unpaid work for a government, including the United States government. Employees directly involved in the practice of the Company's journalism are generally prohibited from doing such work.
- d. With RFA's approval, an employee may sit as an unsalaried member of professional advisory boards and councils; provided that the employee's independence is both preserved and valued in carrying out such duties.

5. Use of Company Assets

- a. Employees are permitted limited use of office equipment for personal needs; provided, that such use does not interfere with their official duties, involves minimal additional expense to the Company, and does not violate any RFA policy or procedure. The Company may at any time revoke or limit the privilege of using Company office equipment for personal purposes.
- b. RFA prohibits the use of its funds for payments to any individual, company or organization for the purpose of obtaining favorable treatment in securing business, news sources or other special considerations, regardless of a perceived benefit to RFA, unless such payments are (i) made pursuant to a written contract signed by an authorized representative of RFA and (ii) do not violate the laws of the United States or the country in which such payment is made.
- c. When employees use Company phones, equipment, or other services for personal business beyond the limited scope permitted by subsection C.5.a above, they must reimburse the Company according to established procedures. Employees who violate this section C5 may be subject to disciplinary action, including termination.

6. Nepotism

- a. It is Company policy that close relatives (defined as spouse, sibling, child, parent, aunt, uncle, niece, nephew, or first cousin, in each case either by birth or marriage) will not be in a supervisory relationship to each other. Exceptions must have RFA's approval.
- b. In those rare instances where RFA approves a supervisory relationship between a manager and a relative, the relationship will be made known to department staff and limited to the assignment of work tasks. The manager may under no circumstances play a role in determining the pay, merit award, promotion, other benefits or disciplinary action of a relative; such responsibilities will be assigned to another manager.

Links to Related RFA Policies and Information:

[Code of Journalistic Ethics](#)

[Disciplinary Action](#)

[Disclosure Form](#)

[Media/Press Appearance Approval Form](#)

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[Termination of Employment](#)

[Use of Technology Resources](#)

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