

**DETROIT EDUCATIONAL TELEVISION FOUNDATION
DETROIT PUBLIC TELEVISION
CONFLICT OF INTEREST POLICY**

Statement of Purpose

This policy is to assure that the programs, operations and activities of the Detroit Educational Television Foundation, licensee of Detroit Public Television, station WTVS Channel 56, (“DPTV”) are conducted in a manner which merits continuous public trust and confidence and avoids actual or perceived conflicts of interest. This policy is applicable to all trustees, officers, ex-officio members, employees and agents of DPTV, collectively referred to as “DPTV Representatives.” The conflicts of interest regulated by this policy include all situations in which a DPTV Representative has a **personal financial interest in the decisions or actions of DPTV**. All DPTV Representatives are expected to carry out their duties and responsibilities to DPTV without consideration of their individual financial interests and without deriving individual financial benefit from their actions. This policy shall be interpreted and applied in a manner which insures that all decisions and actions of the DPTV Representatives are motivated solely by a desire to promote the best interests of DPTV and its service to the community, and not by self-interest.

Fiduciary Responsibilities

The men and women who serve as DPTV Representatives are often qualified for their duties and responsibilities by their service to other organizations and institutions to which they also owe fiduciary responsibilities. In addition, all DPTV Representatives have individual interests, which may occasionally be affected by the decisions and actions of DPTV. Conflicts of interest should be regarded as normal occurrences for persons with wide ranging responsibilities. This policy is intended to provide for the orderly disclosure and regulations of such conflicts and to avoid any appearance that conflicting interests have influenced the decisions and actions of DPTV. Personal business interests and responsibilities to other organizations should not be an impediment to service as a DPTV Representative.

Disclosure

DPTV Representatives should disclose all conflicts of interest to DPTV, or its President, immediately as they occur, when they first become known or at regular intervals for continuing relationships which could be defined as conflicts of interest. Uncertainties as to whether information requires disclosure under this policy may be resolved by consultation with the President of DPTV, who may in turn, consult with legal counsel, the Executive Committee, Finance Committee or the Board of Trustees. Such disclosures may be made in confidence at the request of the disclosing party, and confidential information will not be disclosed by DPTV to third parties except upon a determination, following consultation with the disclosing party, that compelling institutional reasons necessitate disclosures to third parties. Such disclosure will be made at the sole discretion of DPTV. As a broadcast licensee, DPTV is required by the Federal Communications Commission to disclose and file information about trustees and officers with respect to the ownership of other broadcast interests, as well as certain matters involving adverse judgements.

Abstention

DPTV Representatives shall abstain from participating in decisions or actions or the consideration of decisions or actions in which they have a conflict of interest and they shall not be present for the discussion or voting on any such matters unless expressly requested to provide information or interpretation. In the event that a conflict of interest is discovered after action has been taken on a matter by a DPTV Representative, the action shall be reconsidered by the acting body without the participation of the DPTV Representative having the conflict of interest.

Gifts

DPTV Representatives should refrain from accepting personal gifts, benefits or services from third parties who transact business with DPTV and/or seek special favors from DPTV. This restriction shall not apply to gifts attributable mainly to personal relationships unrelated to DPTV, such as meals, refreshments and entertainment, gifts related to special events such as promotions, weddings, birthdays and similar occasions, or to awards provided by civic, educational, professional or similar organizations, or token items which are not provided with the expectation of special favors. Any offers of gifts in excess of \$100 to DPTV Representatives by third parties seeking special benefits or privileges shall be reported to DPTV and should be returned to avoid conflict of interest and/or embarrassment.

Certification

Each DPTV Representative shall be provided with a copy of this policy and shall certify to DPTV, at least annually, on a form to be provided by DPTV, that he or she has read the policy, and that he or she has disclosed on such form any conflict of interest or prohibited gift.

Definitions

The following definitions shall be used in interpreting and applying this policy:

Conflict of Interest

“Conflict of interest” means any situation in which a DPTV Representative, member of his or her immediate family, or entity in which any of them have a substantial business interest is engaged in a relationship or transaction with DPTV from which he or she or his or her immediate family members are expected to derive economic benefit or in which their decisions or actions on behalf of DPTV might appear to be motivated by self-interest.

Substantial Business Interest

“Substantial business interest” means any business activity in which a DPTV Representative or a member of his or her immediate family has an interest or is an officer, director, employee, trustee, partner, controlling stockholder or member, who separately or collectively is or are the beneficial owner or owners of more than 5% of the voting or equity interest of such business activity or entity.

Immediate Family Member

“Immediate family member” includes the spouse, parents, siblings or children of the DPTV Representative, or any other person who resides in the same household as the DPTV Representative.