

IAPE note: This is a 1996 statement from Paul Steiger, then the managing-editor of The Wall Street Journal. These are the standing – and accepted – guidelines governing the outside activities of IAPE-represented employees of Dow Jones. The Company can not impose changes in this policy without prior negotiations with IAPE.

WSJ'S GUIDELINES ON OUTSIDE ACTIVITIES

This memo is a slightly revised version of one first issued in 1992. But with fleeting memories and considerable staff turnover, it seems to bear repeating. It concerns the Journal's attitude toward outside activities -- including books, films, freelance writing, speeches, television appearances, political action and service in charitable organizations.

Our basic guide to such issues is, of course, Dow Jones's long-standing Conflicts of Interest Policy. This note represents no change in that policy. And the most important wisdom about dealing with these questions is: When in doubt, ask.

Generally, outside activities performed on your own time are fine, provided that they are consistent with the Conflicts of Interest Policy, don't become so time-consuming that they compromise your performance and conform to the more specific criteria discussed below. Obviously, you should NOT undertake any outside activities that would aid a competitor to the WSJ or Dow Jones, or pose a risk to the paper, such as by hurting its reputation, exploiting its name, or diminishing your own or your colleagues' access to news sources.

Outside activities performed all or partly on the job, or that require a leave of absence, may be done only with my approval. I will normally approve the proposed activity if it:

0. Complies with the criteria for personal-time activities listed above and the more specific points laid out below;
0. Promises to benefit the WSJ enough to offset, at least partly, the lost time of the staffer involved. These benefits may include bringing credit to the Journal and rewarding staffers for their sustained contributions; and

0. Is endorsed by the staff member's editor or bureau chief.
What follows is a discussion of the principal categories of outside activities and how I think we should approach them:

FREELANCE WRITING

Journal staffers should not undertake freelance writing either for publications that compete substantially with the Journal (or SmartMoney or Barron's) or on a topic of core interest to Journal readers. If the topic is appropriate to the Journal, the WSJ should be given first crack at the idea. Articles reported for the Journal but rejected by its editors are nevertheless the property of Dow Jones, and should not be shopped elsewhere without my approval or that of Barney Calame. As called for in our IAPE contract, someone doing a freelance piece must also get my consent (or Barney's) if they wish to be identified as a Journal staffer.

SPEECHES

Journal news staffers should not accept paid speaking engagements, or accept any reimbursement of travel expenses in connection with an unpaid speech, without prior approval from Barney Calame or me. We will not approve paid speeches to profit-making entities. We will approve paid speeches to other organizations only if there is no conflict or appearance of conflict with the person's responsibilities at the Journal. Unpaid speeches and panel appearances should also be avoided when the forum is a profit-making "seminar" or similar event operated by a company other than Dow Jones.

BOOKS

We have gone from active discouragement of books by Journal staffers to a point where, at any given moment, at least three or four of our reporters and editors are on leave to write them. I believe that, on balance, the paper has benefited significantly from this change, in terms of the development of our people, the information we have gained, and the talent we have retained. But an explosion of interest by publishers in business books, and an escalation in the sums they were willing to pay, caused us to develop some criteria to

consider in determining under what conditions to grant a book leave. Among them are:

- 0. The managing editor's assessment of the potential benefit to the Journal from having this person write this book;
- 0. Whether the person's performance warrants such a leave;
- 0. How long the person has been on the staff, and the length of time since the last book leave;
- 0. The need to prevent the potential for a book contract from influencing or appearing to influence our coverage, and the need to strictly enforce the prohibition in the Conflicts of Interest Policy against disclosure of the timing or content of Journal stories;
- 0. Commitment by the author or authors to provide the Journal access to hot news as it is learned in the research for the book, rather than having explosive revelations saved until the book is published;
- 0. A reservation to the Journal of both an option on first serial rights and a "negative option" requiring my consent for the granting of such rights to certain other competing publications;
- 0. An agreement by the book publisher to obtain insurance, or your own acquisition of insurance against defamation and invasion of privacy lawsuits filed against you as a result of your work on and the publication of the book. Should you solicit another Dow Jones employee to assist you in researching or writing the book, you would agree to do so only if the publisher of the book, or your insurer, agrees to extend the coverage of the insurance policy to protect such other Dow Jones employee. The insurance policy must be acceptable to the Dow Jones legal department.

TELEVISION APPEARANCES

As with books, we have gone from discouraging television (and radio) appearances by Journal news personnel identified as such to encouraging some that meet certain criteria. Among the criteria we consider are:

- 0. Whether the person is sufficiently experienced and knowledgeable about the anticipated subjects to reflect creditably on the WSJ;
- 0. Whether the person will be called on to pose questions and report

- information, or whether the program format calls for the person to interpret news or express opinion (in the latter case only the most experienced Journal people will be eligible); and
0. Whether the environment of the program -- its format, the other participants -- is of a sort likely to reflect credit on the WSJ. The same criteria should apply to participation in on-line forums or bulletin boards.

In the case of programs on which Journal staffers have appeared before and the format of which involves interviewing newsmakers or reporting information, I consider approval by a bureau chief sufficient. In other cases, or if you have any doubts, please check with me. As with freelance writing, we will not permit Journal staffers to contribute to television operations which compete directly with those operated by Dow Jones, such as CNBC or CNNfn.

FILMS

The motion picture rights to Journal articles written by news staffers belong to Dow Jones. The company is prepared to entertain offers for those rights from producers or others. Journal staffers are free to do paid work on motion pictures, provided that work meets the general guidelines for outside activities listed above.

SERVICE IN NON-PROFIT ORGANIZATIONS

We encourage such service, so long as it is unpaid and otherwise consistent with the Conflicts of Interest Policy. You should not seek to raise money for such organizations from individuals or entities that you may cover or edit coverage of. And you should avoid having your affiliation with the WSJ or Dow Jones identified in the organization's materials -- unless, of course, the organization is a journalistic one (such as the National Association of Black Journalists, the Gridiron, etc.) or you serve as a representative of the Journal or Dow Jones.

POLITICAL ACTIVITIES

I believe all Journal news staffers should refrain from any involvement in partisan political activities. Beyond that, you should also not participate in any other campaign that is or is likely to be within your reportorial or editorial responsibility. There should be no use of one's Journal affiliation in any political activity that one does undertake. Non-partisan political activity (on an "issue" rather than for a candidate) is unobjectionable, even at the national level, so long as it is unpaid and consistent with these guidelines -- that is, not in your coverage area, and with no reference to your Journal affiliation.

Paul Steiger
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