

GENERAL EEO POLICY

WURD Radio, LLC is an African American owned and operated radio station. It is the policy and practice of WURD Radio, LLC (hereafter "WURD") to offer equal employment opportunities ("EEO") to all qualified persons; that no person shall be discriminated against in employment because of race, color, age, religion, national origin, gender, marital status, disability, except when the disability is a *bona fide* occupational disqualification, veteran status, citizenship, sexual orientation, or any other characteristic protected by applicable federal, state or local law; and that positive recruitment, job design and other reasonable measures will be pursued to ensure genuine equality of opportunity ("EEO Policy").

The WURD EEO Policy applies to all areas of employment, including recruitment, hiring, training and development, promotion, seniority practices, transfer, termination, layoff, compensation, benefits, and all other terms, conditions, responsibilities and privileges of employment. WURD will not tolerate any form of discrimination based on any of the aforementioned factors. WURD's EEO Policy is communicated and provided to all applicants and new employees in writing and by notices posted in the designated area at WURD's broadcast station.

In support of WURD's commitment to ensuring equal employment opportunities for all applicants, WURD has established a recruitment program that includes dissemination of notices of all full-time job vacancies to recruitment sources used to reach all elements of the community unless such vacancies are to be filled through internal promotion, or on a temporary or emergency basis. All internal promotions will be fulfilled without discrimination based on race, color, age, religion, national origin, gender, marital status, disability, except when the disability is a *bona fide* occupational disqualification, veteran status, citizenship, sexual orientation, or any other characteristic protected by applicable federal, state or local law.

GENERAL EEO GUIDELINES

Management of WURD has the responsibility for overseeing that its EEO Policy is fulfilled. Sara Lomax Reese, General Manager of WURD is responsible to ensure that the EEO Policy is fulfilled. In connection with EEO matters, each General Manager reports directly to M. Claire Lomax, Esq., WURD's General Counsel. Attorney Lomax is responsible for fulfilling WURD's EEO Policy at WURD's corporate offices and to oversee and coordinate EEO matters. (Collectively, the General Managers and Attorney Lomax are WURD's "EEO Team.") The EEO Team will make its best efforts to ensure that:

- Employees, applicants, employee organizations, and recruitment sources are informed of WURD's EEO Policy;
- An internal program is maintained to ensure that no employment discrimination based on race, color, age, religion, national origin, gender, marital status,

disability, except when the disability is a *bona fide* occupational disqualification, veteran status, citizenship, sexual orientation, or any other characteristic protected by applicable federal, state or local law exists within WURD;

- Review on a regular basis, and no less often than annually, WURD's procedures to effectively ensure fulfillment of its EEO Policy. At the time any full-time position is filled, the General Manager of WURD, or Attorney Lomax if the position is in the corporate offices, shall review the effectiveness of the process and recruitment sources that contributed to the individual hiring decision, and determine that all relevant records have been properly maintained. Such individual hiring reviews will be part of the EEO Team's company-wide regular review process.

EEO PROGRAM PROCEDURES

Recruitment Program

WURD will endeavor to apply all of its recruitment procedures to every opening for a full-time position, *i.e.* employment which requires working 35 or more hours per week, except that recruitment procedures may not be used for jobs to be filled by internal promotion, for temporary employees to be hired for a period of time of six months or less, for part-time employees, for interns, or in the event of exception or emergency circumstances necessitating immediate hiring. WURD will try to apply its recruitment procedures to fill a temporary position or an intern position being converted to a permanent position.

As needed, a description of every full-time job opening will be circulated to the recruitment sources and contacts set forth herein in the following "Recruitment Sources" and all applicants will be asked complete an employment application consistent with the sample form included herein. Employment notices will be directed to every recruitment source on the list as soon as practicable after the decision has been made to fill a full-time opening, and by the fastest means reasonably available.

Recruitment Sources

WURD will use the following recruitment sources to fulfill vacancies for full-time positions:

1. Announcements made on air;
2. Monster.com
3. CraigsList
4. Philly Ad News
5. 900AM-WURD website
6. Word of Mouth/Referrals
7. Philadelphia Association of Black Journalists

WURD requests race, gender and ethnicity information from each full-time applicant. WURD will not require the submission of this information as a requirement for consideration for employment. Each applicant's race, gender and ethnicity information will be removed from the employment application and retained for record-keeping and reporting requirements, but will not be present to the employment decision-makers so that such information cannot influence the hiring process.

At the conclusion of each hiring process, the relevant member of the EEO Team will review the effectiveness of the process by examination of the process by which the qualifications of applicants were considered, the effectiveness of the recruitment sources in providing a flow of applicants, and the records described below, in order to ensure that the WURD EEO Policy is being fulfilled. This analysis must include a review of the recruitment sources used by WURD, as well as the race, ethnicity, and gender of the applicants who sought employment with the station as a result of WURD's recruitment efforts. Recruitment sources and procedures will be deleted, added or modified if, in the reasonable judgment of the relevant General Manager, Attorney Lomax, or the EEO Team, that such change would further promote the EEO Policy or make the process more inclusive.

Recordkeeping

WURD maintains a recordkeeping system to maintain EEO information sufficient to fulfill its EEO Policy and to comply with required recordkeeping and reporting requirements. It's broadcast station and its corporate offices, maintain records of:

- Every full-time job vacancy filled;
- The title of full-time job vacancy filled;
- All recruitment sources used to fill each full-time job vacancy filled, noting name, address, contact person, and telephone number of such sources, where available;
- Copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing or advertising job vacancies;
- The recruitment source, gender, race and ethnic origin of each applicant for every fulltime job vacancy filled. WURD will maintain as much of this information as applicants voluntarily disclose.

WURD believes that its EEO policies and procedures are effective in offering equal opportunity to all potentially interested job-seekers in our community and in achieving a diverse work force of minorities and women. Our internship program provides a pipeline for people from different backgrounds to learn the radio business and consider it as a career option. Based on all the possible approaches to achieving the goals of the FCC's

EEO program, our experience has shown that our approach is highly effective and one which we plan to continue.