

CODE OF ETHICS AND BUSINESS CONDUCT

Direct Care and Treatment

Executive Board

Issue Date: 12/08/2025 Effective Date: 12/08/2025 DCT Executive Board Policy Number: 100-1005

POLICY:

Executive Board members of Direct Care and Treatment (DCT) must maintain the highest standards of integrity, honesty, and ethical conduct when carrying out their responsibilities.

AUTHORITY:

[Minn. Stat. § 246C.07, subd. 3\(a\)\(2\) \(Powers and Duties of Executive Board\)](#)

[Minn. Stat. Ch. 13](#)

[Minn. Stat. § 10A.071](#)

[MMB HR/LR Policy # 1445](#)

APPLICABILITY:

DCT Executive Board Members

PURPOSE:

To establish clear ethical standards and expectations for Executive Board members that promotes ethical behavior, ensures compliance with applicable laws and regulations, and fosters a culture of accountability and honesty among the Executive Board members.

DEFINITIONS:

DCT resources – DCT physical assets (such as buildings and equipment); electronic, digital, and virtual assets (such as DCT telephone system, DCT website, DCT email, and remote communications platforms offered by DCT such as Teams); personnel time, the DCT logo, and financial assets (including external funds made available for use by DCT or any of its employees).

Fiduciary responsibility – a legal or ethical duty of loyalty and trust in which the individual has an obligation to act for the benefit of or to safeguard the interests of another person or entity.

Personal gain – Any interest, including, but not limited to a financial, pertaining to a person or business whereby the person or business would gain a benefit, privilege, exemption, or advantage from the actions of DCT or an employee that is not available to the general public.

PROCEDURES:

A. Scope

1. This policy is intended to guide the conduct of the DCT Executive Board in their capacity as board members. DCT Executive Board members are subject to Minnesota state and federal laws regarding political activities and the use of state resources for political activities.
2. This policy supplements, but does not replace, applicable state and federal laws governing political activities applicable to DCT Executive Board members. In the event of a conflict between a provision of this policy and state or federal laws, state or federal law will control.

B. Duty of Care

1. Executive Board members must uphold their fiduciary responsibility to DCT and exercise reasonable care and diligence when making decisions in an official capacity.
2. Executive Board members should review all materials provided in advance of Board and committee meetings, attend meetings absent good cause, remain educated about DCT's operations and its services, and make inquiries about any concerns that come to their attention.

C. Loyalty

1. Executive Board members must act in good faith and in support of DCT's mission. They should never use their position for personal gain.
2. Executive Board members must comply with DCT Executive Board Policy 100-1000, "Conflict of Interest" and participate in annual conflict of interest disclosure process.
3. Executive Board members may not use DCT resources for personal gain or to facility personal gain by any other individual.

D. Integrity

1. Executive Board members should act with integrity and in an ethical manner by complying with all laws, rules, and regulations applicable to DCT.
2. Executive Board members are prohibited from accepting gifts except as provided in [Minn. Stat. § 10A.071](#).
3. Executive Board members will encourage DCT employees to report suspected wrongdoing and will not retaliate against any person who in good faith reports any of the following to DCT, the Office of Management and Budget, the Office of Legislative Auditor, Bureau of Criminal, Apprehension, or other law enforcement authorities, or who participates in an investigation of such reports:
 - a) misconduct;
 - b) violations of this or other policies;
 - c) significant internal control weaknesses;
 - d) crimes against DCT, patients or its clients (e.g. fraud or theft in the workplace); or
 - e) unlawful use of DCT resources.

E. Enforcement and Reporting

1. Any suspected violation of, or question about, this policy should be reported to the DCT ethics officer or general counsel.
2. Violations may result in disciplinary action, including removal from the Executive Board, in accordance with DCT bylaws and applicable law.

REVIEW:

Biennially

REFERENCES:

DCT Executive Board Policy 100-1000, "Conflict of Interest"

ATTACHMENTS:

None.

SUPERSESSION:

All DCT Executive Board policies, memos, or other communications whether verbal, written, or transmitted by electronic means regarding this topic.

Carol Olson

/s/ Carol Olson

DCT Executive Board

Executive Board Chair

Direct Care and Treatment