

Code of Ethics and Business Conduct

Objective

The success of our mission is dependent on the trust and confidence we earn from our employees, partners and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct.

Confidential and Proprietary Information

Employee Records

DAC retains and destroys personnel records in accordance with policies on records retention, as well as federal and state laws governing record retention. It is important to us that we keep employees safe from misuse of their personal information.

See the Record-Keeping Policy for more information.

Proprietary Information

Integral to DAC's success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, members and other partners. Confidential and proprietary information includes such things as pricing and financial data, member or partner names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Selective Disclosure

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to DAC, its securities, business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations to ensure that our presentations do not contain material nonpublic information.

Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the actions we take on behalf of DAC may conflict with our own personal or family interests. We owe a duty to DAC to advance its legitimate interests when the opportunity to do so arises. We must never use DAC property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with DAC.

Here are some other ways in which conflicts of interest may arise:

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with DAC.



2. Hiring or supervising family members or closely related persons.
3. Serving as a board member for a competing commercial company or organization.
4. Owning or having a substantial interest in a competitor, supplier or contractor.
5. Having a personal interest, financial interest or potential gain in any DAC transaction.
6. Placing company business with a firm owned or controlled by a DAC employee or his or her family.
7. Accepting gifts, discounts, favors or services from a member or partner/potential member or partner, competitor or supplier, unless equally available to all DAC employees.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from leadership. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their supervisors or the Director of Operations.

Gifts, Gratuities and Courtesies

DAC is committed to competing solely on the merit of our services. We should avoid any actions that create a perception that favorable treatment of outside entities by DAC was sought, received or given in exchange for personal member or partner courtesies. Member or partner courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom DAC does or may do member or partner. We will neither give nor accept member or partner courtesies that constitute, or could reasonably be perceived as constituting, unfair member or partner inducements that would violate law, regulation or policies of DAC or members, or would cause embarrassment or reflect negatively on DAC's reputation.

Offering Courtesies

Any employee who offers a member or partner courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair advantage or otherwise reflect negatively upon DAC. An employee may never use personal funds or resources to do something that cannot be done with DAC resources. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than to our government partners, for whom special rules apply, we may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items). Further, leadership may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of DAC.

Recordkeeping

We create, retain and dispose of our company records as part of our normal course of business in compliance with all DAC policies and guidelines, as well as all regulatory and legal requirements.



All organizational records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with DAC's and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of DAC books, records, processes or internal controls.

Please reference the policy manual for further information on record retention.

Use of Company Resources

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible if it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent DAC are trusted to behave responsibly and use good judgment to conserve company resources. Supervisors are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work-related materials during work hours.

In order to protect the interests of the DAC network and our fellow employees, DAC reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or DAC's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your supervisor.

Public Information

Media Inquiries

DAC is a high-profile organization in our community, and from time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to the Executive Director. No one may issue a press release without first consulting with the Executive Director.

Accurate Public Disclosures

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.



Employees should inform the Executive Director and the Director of Operations if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

Electronic Communication

DAC uses various forms of electronic communication including, but not limited to computers, email, telephones, voicemail, instant message, text message, Internet, cell phones and smart phones (hereafter referred to as “electronic communications”). The electronic communications, including all software, databases, hardware and digital files, remain the sole property of DAC and are to be used only for DAC business and not for personal use.

The following rules apply to all forms of electronic communication and media that are (1) accessed on or from company premises; (2) accessed using the company computer or telecommunication equipment or via company-paid access methods and/or (3) used in a manner which identifies the company. The following list is not exhaustive, and the DAC may implement additional rules from time to time.

- a. Electronic communication and media may not be used in any manner that would be discriminatory, harassing, or obscene or for any other purpose that is illegal, against company policy, or not in the best interest of the company. Employees who misuse electronic communication and engage in defamation, copyright or trademark infringement, misappropriation of trade secrets, discrimination, harassment, or related actions will be subject to discipline, up to and including termination.
- b. Employee’s own electronic media may only be used during breaks. All other company policies including the company’s no tolerance for discrimination, harassment or relations in the workplace apply.
- c. All electronic information created by any employee on company premises or transmitted to company property using any means of electronic communication is the property of DAC and remains the property of DAC. You should not assume any electronic communication is private or confidential and should transmit personal sensitive information in other ways. Personal passwords may be used for purposes of security, but the use of a personal password does not affect DAC’s ownership of the electronic information. DAC will override all personal passwords if necessary, for any reason.
- d. DAC reserves the right to access and review electronic files, messages, internet use, blogs, “tweets”, instant messages, text messages, email, voicemail and other digital archives, and to monitor the use of electronic communications as necessary to ensure that no misuse or violation of company policy or any law occurs. All such information may be used and/or disclosed to others, in accordance with business needs and the law. DAC reserves the right to keep a record of all passwords and codes used and/or may be able to override any such password systems.
- e. Employees are not permitted to access the electronic communications of other employees or third parties unless directed to do so by DAC leadership. No employee may install or use anonymous email transmission programs or encryption of email communications.



- f. Employees who use devices on which information may be received and/or stored, including but not limited to cell phones, cordless phones, portable computers, fax machines and voice mail communications are required to use these methods in strict compliance with the Confidentiality section of this Manual.
- g. Access to the Internet, websites and other types of company-paid computer access are to be used for company related business only. Any information about Allen County Drug and Alcohol Consortium, its products or services, or other types of information that will appear in the electronic media about DAC must be approved before the information is placed on any electronic information resource that is accessible to others.

Social Media

Allen County Drug and Alcohol Consortium is committed to utilizing social media to enhance its profile and reputation, to listen and respond to member/partner opinions and feedback to drive community support, loyalty and advocacy. We encourage employees to support our activities through their personal social networking channels while adhering to the guidelines outlined in this section. Association with DAC on employee's personal social media channels elevates the requirement for professionalism and adherence to this social media.

For the purpose of this section, social media and networking refers to the use of web-based and mobile applications for social interaction and the exchange of user-generated content. Social media channels can include but are not limited to Facebook, Twitter, LinkedIn, YouTube, blogs, review sites, forums, online communities and any similar online platforms.

Employees are expected to conduct themselves in a professional manner and to respect the views and opinions of others. DAC and its employees are committed to acting in accordance with best industry practices in social networking, to being responsible citizens and community members, to listening and responding to feedback and to communicating in a courteous and professional manner. Behavior and content that may be deemed disrespectful, dishonest, offensive, harassing or damaging to DAC's interests or reputation are not permitted. The use of social media channels on company time for personal purposes is not allowed.

Any social media contacts, including "followers" or "friends" that are acquired through accounts including but not limited to email address, blogs, Twitter, Facebook, YouTube, LinkedIn or other social media networks) created on behalf of DAC will be the property of DAC.

Employees must not disclose *private or confidential information* about DAC, partners or funders on social networks. Sharing information regarding partner or network activities is permitted without explicit consent by the subject if that information is already public, such as promotion of a partner agency's fundraiser. Employees must respect trademarks, copyrights, intellectual property and proprietary information. No third-party content should be published without prior permission from the owner.

DAC maintains the right to monitor company-related employee activity in social networks. Violation of policy guidelines is grounds for discipline, up to and including termination.



Personal Phone Calls

The use of personal cell phones in the office can interfere with work and be disruptive to others. Likewise, taking personal calls on office lines can have a similar impact on the workplace. Therefore, employees who bring personal cell phones to work are required to keep their ringer shut off or placed on vibrate mode when they are in the office, and to keep personal use confined to breaks and meal periods. Conversations should be had away from areas where other employees are working. If personal calls are taken on office equipment, calls should be kept brief and/or confined to breaks and meal periods. When cell phone use interferes with the satisfactory performance of an employee's duties or disturbs others, the privilege of using a personal cell phone at work may be taken away and other disciplinary action up to and including termination, may be imposed.

When cell phones are used for DAC business, employees must comply with all company policies governing conduct, including our policies prohibiting discrimination, harassment and violence in the workplace. When using the cell phone in a public place, please remember to maintain the confidentiality of any private or confidential business information. As a courtesy to others, please shut cell phones off or place on vibrate mode during meetings.

Accountability

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code of Ethics & Business Conduct (Code) and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the Director of Operations. DAC takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

Information and Resources

| Executive Director | Board President |
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| MaryClare Akers | Stephen Jarrell |
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| maryclare@dacac.org | Stephen.jarrell@headwaterscounseling.org |

Policy Approval

Board President

Board Vice President

Date Signed

Date Signed



Code of Ethics & Business Conduct Certificate of Receipt

I hereby certify that I have received a copy of DAC's Code of Ethics & Business Conduct.

Employee Signature

Date

Witness Signature

Date