GET FREE MINNESOTA

Official Policy Registry | GFMN-POL-001

Code Of Business Conduct And Professional Ethics

Approval. Board of Directors, October 30, 2026 (Resolution 1).

Version. Policy version 1.0.

Status. Approved.

Effective date. Adopted and effective September 30, 2026; reaffirmed October 30, 2026.

Record notes. Includes the complete Code and blank acknowledgment page.

Public registry edition. Substantive resolution, policy and exhibit text is preserved. Packet distribution markings, obsolete navigation and proposal labels are omitted. Restricted Board source records remain in the archive.

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RESOLUTION 1

Code Of Business Conduct And Professional Ethics

WHEREAS, GFMN requires ethical conduct, responsible stewardship and fair accountability from everyone acting on its behalf; and

WHEREAS, the Code identified in the policy register states that it was adopted and effective September 30, 2026;

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors:

1. Adopts And Reaffirms The Code. Approves the identified Version 1.0 as GFMN policy and reaffirms any valid prior adoption. This resolution takes effect upon adoption and creates no retroactive sanctions. The Secretary shall preserve the prior adoption record and this action together.

2. Confirms Its Scope. The Code applies to Directors, Officers, employees, interns, contractors, subcontractors, volunteers and others acting for GFMN, as described in the Code. Each person is accountable within the authority and procedures applicable to their role.

3. Directs Implementation. The Interim Executive Director shall distribute the Code, explain reporting options, provide accessible orientation and track acknowledgments. The Secretary shall coordinate Director and Officer records. Signed acknowledgments are due within five business days of electronic delivery, subject to legally required accommodations and binding agreements. An acknowledgment confirms receipt and does not waive rights.

4. Requires Fair Administration. Disclose and address conflicts under the existing conflict of interest policy. Report concerns to an uninvolved authorized recipient, bypassing an implicated supervisor. Reviews shall distinguish allegations from findings, identify the applicable contractual or policy duty, preserve relevant records and give the person a reasonable opportunity to respond. Decisions shall be impartial, documented and confidential to the extent permitted by law. Good-faith reporting, protected criticism and lawful participation remain protected against retaliation.

5. Preserves Proper Decision Authority. Employment and contractor engagement decisions must follow the Decision Matrix, written delegations, applicable law and binding agreements. Adopting these resolutions does not approve any individual's hiring, reassignment or termination. Record each later decision, its basis and required approvals separately. Removal from a Director, Officer or member role requires its own applicable procedure and approval. This resolution does not amend the Articles or Bylaws.

6. Requires Oversight. At the next regular Board meeting, the Interim Executive Director shall report distribution, acknowledgment completion and implementation needs without disclosing protected complaint or medical details. The Board shall review the Code at least annually; material revisions require prior written approval from the Board of Directors.

Authority: GFMN Bylaws Sections 2.7, 5.3 and 5.5; Decision Matrix personnel policy responsibilities; Minn. Stat. Sections 317A.251 and 317A.461.

Get Free Minnesota

Code of Business Conduct and Professional Ethics

Version 1.0 | Prepared September 30, 2026

Adopted and effective September 30, 2026. Signing instructions updated October 1, 2026.

Our purpose and standard

Get Free Minnesota serves justice-impacted communities, including people who are incarcerated and people returning to their communities. We value the experience and leadership of formerly incarcerated people. Our work requires trust, sound judgment and the highest standards of integrity from everyone acting for the organization.

We treat people with dignity, respect their choices and protect their ability to raise concerns. We assess current conduct fairly. A person's history of incarceration, identity or disagreement with leadership is not a substitute for evidence of misconduct. Accountability supports the safety of our communities and the credibility of our work.

Who must follow and sign this Code

This Code applies to all employees, interns, contractors, subcontractors, volunteers and others while performing work or services for Get Free Minnesota, using entrusted resources or acting on its behalf. It also applies to directors and Officers acting for the organization. It covers program activities, events, institutional visits, work travel and related electronic communications.

Everyone covered must receive the Code and have a reasonable opportunity to read it and ask questions. Return this signed acknowledgment to the Executive Director or the Board Chair within five business days after electronic delivery of the Code. No discretionary extensions or exceptions apply. Legally required accommodations and procedures and binding agreements remain applicable. New personnel must receive the Code before beginning their assignment.

Apply the Code lawfully

Applicable law, binding contracts, collective bargaining agreements and the bylaws govern if there is a conflict. Any required bargaining or contractual agreement must occur before affected changes apply. This Code does not change worker classification, guarantee employment for a fixed term or create a fixed sequence of discipline. It applies prospectively from its effective date.

When unsure, pause and ask whether the action is lawful, within your authority and consistent with the rights and safety of the people affected. Seek guidance from the Executive Director or an uninvolved Board member before making an organizational commitment.

Respect and safety in our work

Prevent discrimination harassment and retaliation

Discrimination, harassment and retaliation are prohibited. This includes discriminatory slurs, unwanted sexual conduct, discriminatory threats and other unlawful mistreatment based on race, color, creed, religion, national origin, sex, pregnancy, gender identity, sexual orientation, disability, age, marital or familial status, public assistance status or any other legally protected status. We also prohibit mistreatment because a person is justice impacted or formerly incarcerated.

These standards protect staff, interns, volunteers, program participants and partners. Supervisors must act promptly on concerns and support lawful accommodations. Disagreement, criticism of leadership and protected discussions about working conditions are not themselves harassment or misconduct.

Maintain safe and professional boundaries

Threats, violence, coercion and deliberately creating a serious safety risk are prohibited. Follow approved safety procedures and report urgent concerns promptly. For an immediate danger, contact emergency services when appropriate and notify the Executive Director or an uninvolved reporting contact as soon as it is safe. Comply with any legally required reporting duties; an internal report does not replace a required external report.

Respect consent and personal boundaries. Never condition assistance, opportunities or access on sexual contact, money, personal favors or political loyalty. Do not exploit an imbalance of authority or a participant’s dependency. Disclose a personal relationship that could affect your professional judgment and obtain guidance about appropriate boundaries.

Prohibit abusive and sexually explicit content

Knowingly accessing, viewing, sharing, distributing or using child sexual abuse material (CSAM), sexually explicit content, or content depicting violence or abuse against humans or animals in organizational work, communications, events, accounts or systems is prohibited. Substantiated violations are grounds for immediate termination of employment or ending another engagement, subject to applicable law, binding agreements and the required decision process.

Lawful, authorized handling of non-CSAM material for legitimate advocacy, training or evidence review is permitted only through appropriate, restricted processes. This provision does not prohibit good-faith reporting or legally protected activity. Accidental exposure promptly reported and not deliberately continued is not itself misconduct.

If CSAM is suspected, stop viewing it and do not download, copy, forward or distribute it. Report its location promptly to the Executive Director or an uninvolved reporting contact. Follow legal counsel’s instructions for lawful reporting and preservation.

Respect the people and communities we serve

Use language that respects people's dignity and follow their preferences about how they are described. Do not pressure anyone to disclose a conviction, trauma, health information or personal story. Obtain informed permission before using a person's name, image or story in an organizational publication, and explain the intended audience and use. Participation in services must not depend on publicity consent.

During institutional visits and justice-system work, comply with lawful safety and access requirements. Do not facilitate contraband, violence or unlawful activity. Respect lawful organizing, protest and advocacy, including the right to raise concerns about institutions. Give legal, clinical or other regulated advice only when qualified and authorized; otherwise connect people with appropriate resources.

Authority conflicts and stewardship

Work within your assigned authority

Employees must follow lawful, reasonable work instructions within their assigned roles and bring unresolved questions to their immediate supervisor or the Executive Director. Volunteers must follow the agreed scope of their assignment. Contractors and subcontractors must meet their agreed scope, deliverables and authorized conduct requirements; this Code does not direct the independent methods reserved to them by contract.

Do not claim a leadership role, issue official instructions, commit funds, enter contracts or make promises on the organization's behalf without delegated authority. Confirm ownership of overlapping assignments instead of creating competing instructions. This requirement does not restrict protected complaints, member participation or contact with unions, advisers or public agencies.

Disclose conflicts and avoid improper influence

Follow the organization's existing Conflict of Interest Policy, including its disclosure, recusal and annual disclosure requirements. Promptly disclose an actual or potential conflict involving personal financial interests, outside work, family relationships or multiple compensated roles. Refer a conflict involving the usual decision maker to the next authorized, uninvolved Officer.

Do not approve your own compensation, contract or reimbursement, or influence an organizational decision in which you have an undisclosed personal interest. Follow the existing policy's process for any necessary approval. Do not give or accept bribes, kickbacks or favors intended to influence a decision. Gifts or entertainment must comply with the existing policy; ask before accepting anything that could compromise judgment.

Protect funds and maintain honest accounts

Spend only within approved authority and funding restrictions. Obtain required approval before committing funds. Keep accurate records of work, time, invoices, expenses, donations and program results. Never submit false claims, bill the same cost twice, conceal a payment or use organizational resources for unauthorized personal benefit.

Respect grant restrictions and donor agreements. Keep approval, payment and reconciliation duties separate where practicable, and disclose a conflict when independent review is

needed. Report a suspected financial irregularity promptly. Correct an honest error with a clear record of the correction; do not rewrite records to hide what occurred.

Information records and communications

Protect entrusted personal and confidential information

Collect and use only information needed for an authorized purpose. Protect participant identities, justice-system and health information, private contact details, donor data, account credentials and personnel records entrusted through your duties. Store them in approved systems and share only with authorized people who need them for that purpose, or as otherwise permitted or required by law.

Do not search personnel or participant files out of curiosity, send restricted information to unauthorized recipients or use it for personal advantage. Report a lost device, misdirected message, unauthorized access or other suspected data incident promptly. Confidentiality requirements do not restrict protected wage discussions, good-faith reporting, cooperation with public agencies or other protected activity.

Support financial transparency and members' lawful inspection rights through the authorized records process. Do not label all financial information confidential or conceal an existing record to avoid scrutiny. Safeguard information that has a legitimate privacy or legal protection while coordinating lawful access.

Keep accurate records and use technology responsibly

Preserve records under the organization's retention instructions and any investigation or legal hold. Do not delete, alter or conceal evidence, fabricate a quote or create a false record. Respect copyright, licenses and other people's intellectual property. This Code does not transfer ownership of pre-existing work or override a license.

Use approved accounts and access controls, protect passwords and do not bypass security restrictions. Do not enter restricted participant, personnel or investigative information into unapproved artificial intelligence tools. Verify technology-assisted work before use and remain accountable for its accuracy. Disclose material AI assistance to the responsible reviewer when it affects the reliability or origin of a work product.

Distinguish official communications from personal views

Make official commitments and speak on behalf of Get Free Minnesota only within your authority. Be accurate about your role, funding, programs and results. Obtain required approval for organizational endorsements, advocacy expenditures and public statements, consistent with applicable law, grants and tax obligations.

You may speak personally, engage in lawful civic activity and exercise protected workplace or union rights. Do not falsely imply that the organization authorized a personal position. Protected criticism or disagreement is not a Code violation merely because it is uncomfortable or unfavorable to leadership.

Reporting concerns and fair accountability

Speak up through an accessible route

Report suspected misconduct, safety concerns or misuse of resources promptly. You may report orally or in writing to your immediate supervisor, the Executive Director, the President, the Board Chair or the Accountability Chair. You do not have to report to your supervisor first. If a contact is involved, holds multiple roles or a position is vacant, choose an uninvolved contact or another uninvolved director. Current contact details will be provided with the Code. Anonymous reports are accepted, although limited information can make follow-up harder.

You may contact a union representative, attorney or public agency without organizational permission. Employees are not required to report internally before exercising a protected right. Supervisors must promptly refer concerns for appropriate review and must not discourage reporting or promise absolute secrecy.

Review concerns fairly and protect against retaliation

The organization will arrange a prompt, impartial review proportionate to the concern, preserve relevant evidence and give the person involved a reasonable opportunity to respond. A decision maker with a conflict must step aside. Information will be shared as needed for a fair review, protective action or legal obligation. An allegation alone is not a finding.

Retaliation is prohibited against a person who raises a concern in good faith, participates in a review, requests an accommodation, refuses an unlawful instruction or exercises protected rights. A report need not be proven to receive protection. Knowingly fabricating evidence is misconduct; an honest mistake, differing recollection or unsubstantiated good-faith report is not.

Apply proportionate consequences

Substantiated violations may result in coaching, corrective requirements or proportionate, lawful disciplinary action, up to and including termination of employment for good cause. Consider the evidence, seriousness, impact, prior notice, support and the person’s response. Serious misconduct may warrant immediate action, subject to law and binding agreements. The Executive Director administers employee decisions within delegated authority; Board oversight and other role decisions follow the decision matrix and bylaws.

For contractors and subcontractors, remedies must follow the applicable contract and law. For volunteers, consequences may include ending an assignment or restricting authorized access. Employee discipline does not automatically remove a director, Officer or member from another role; that requires the proper governance process.

Address a failure to acknowledge the Code

Provide the Code, its mandatory signing deadline and an opportunity to ask questions. No discretionary extensions or exceptions apply; legally required accommodations and procedures must be honored. Failure by a paid employee to sign without a legally protected justification may result in proportionate, lawful discipline. Do not penalize protected objections, withhold earned wages or treat signing as a waiver of rights. Apply the relevant contract or assignment process to contractors and volunteers.

Acknowledgment and signature

Code of Business Conduct and Professional Ethics | Version 1.0

Effective Date: September 30, 2026 Electronic Delivery Date: _____

I acknowledge receipt of this Code and a reasonable opportunity to read it and ask questions. I understand the conduct standards and reporting options and agree to comply with the lawful requirements applicable to my role. I understand that substantiated violations, or an unjustified failure to sign and return this acknowledgment after the stated process, may have the consequences described in the Code.

My signature confirms receipt and acknowledgment. It is not an admission of misconduct, a release of claims, a waiver of protected rights or an amendment to a binding employment, service or collective bargaining agreement. This Code does not change my worker classification or create a fixed employment term or required sequence of discipline.

Employee wage discussion rights and remedies

Minnesota law protects employees' right to disclose their own wages and discuss coworkers' wages voluntarily shared with them. An employer may not require a wage secrecy promise or retaliate for exercising these rights. Employees may bring a civil claim for violations; remedies can include reinstatement, back pay, restoration of lost service credit and removal of related adverse records. These rights do not require others to disclose their pay or authorize disclosure of legally protected information. Other protected workplace discussions and union activities remain protected.

Printed name: _____

Role or assignment: _____

Select all that apply: [ ] Employee [ ] Contractor [ ] Subcontractor

[ ] Volunteer [ ] Director or Officer [ ] Intern

[ ] Other: _____

Contracting organization if applicable: _____

Signature: _____ Date: _____

Return this signed acknowledgment to the Executive Director or the Board Chair within five business days after electronic delivery of the Code. No discretionary extensions or exceptions apply. Legally required accommodations and procedures and binding agreements remain applicable.