

J.M. Murray
Corporate Compliance Plan
March 17, 2026

Table of Contents

<u>Section Number</u>	<u>Section Name</u>	<u>Page Number</u>
I.	Corporate Compliance Policy	2
II.	Compliance Program Oversight	4
III.	Education and Training	6
IV.	Effective Confidential Communication	7
V.	Enforcement of Compliance Standards	8
VI.	Auditing and Monitoring of Compliance Activities	10
VII.	Detection and Response	11
VIII.	Whistleblower Provisions and Protections	12
IX.	Signature Page	12
X.	Pre-Release Revision History and Revision History	13

I. Corporate Compliance Policy

A. Policy

It has been and continues to be the policy of the J.M. Murray (also referred to as the Company) to comply with all applicable federal, state, and local laws and regulations, and payer requirements. It is also the J.M. Murray's policy to adhere to the Code of Ethics that is adopted by the Board of Directors, the Chief Executive Officer, and the Compliance Committee.

B. Commitment

We have always been and remain committed to our responsibility to conduct our business affairs with integrity based on sound ethical and moral standards. We will hold all employees, contracted practitioners, volunteers, vendors, and members of the Board of Directors to these same standards.

C. Responsibility

All employees, contracted practitioners, volunteers, vendors, and members of the Board of Directors shall acknowledge that it is their responsibility to report any instances of suspected or known noncompliance to their immediate supervisor, the Compliance Officer or the Chief Executive Officer. Reports may also be made anonymously to a dedicated off-site call center (866-703-5750) managed by an independent third-party. All reports can be made without fear of retaliation or retribution. Failure to report known noncompliance or making reports which are not in good faith will be grounds for disciplinary action, up to and including termination. Actions will be taken based on company policy and applicable laws and regulations, through the Human Resources Department, including reports related to harassment or other workplace issues.

D. Policies and Procedures

The J.M. Murray will communicate its compliance standards and policies through required training initiatives to all employees, contracted practitioners, volunteers, vendors and members of the Board of Directors. We are committed to these efforts through the distribution of this Compliance Policy and our Code of Ethics.

E. Enforcement

This Compliance Policy will be consistently enforced through appropriate disciplinary mechanisms, including, if appropriate, discipline of individuals responsible for failure to detect and/or report noncompliance. (Please refer to Section C.)

F. Response

Noncompliance detected through any mechanism (i.e., compliance auditing procedures, confidential reporting) will be responded to in an expedient manner. We are dedicated to the resolution of such matters and will take all reasonable steps to prevent further similar violations, including any necessary modifications to the Compliance Plan, and the Compliance Program and Procedures.

G. Due Diligence

The J.M. Murray will, at all times, exercise due diligence with regard to background and professional license investigations for all prospective and existing employees, contracted practitioners, volunteers, vendors, and members of the Board of Directors.

H. Code of Ethics

The J.M. Murray has a Corporate Compliance Plan which incorporates all of the Company's operations. We are dedicated to managing and operating our programs with integrity, ethics and the highest level of business principles. Each employee, contracted practitioner, volunteer, vendor, and member of the Board of Directors contributes to achieving these principals by conducting business activities for the Company using high ethical standards and by promoting a workplace environment in which compliance and ethical business conduct is expected. The J.M. Murray will transact its business in compliance with local, state and federal laws. Instances where questions arise concerning the interpretation/application of these laws and regulations will be referred to a member of the JM Murray Executive Team, the Compliance Officer, or the Chief Executive Officer.

Employees, contracted practitioners, volunteers, vendors, and members of the Board of Directors may not engage in any conduct that conflicts, or is perceived to conflict, with the best interest of the J. M. Murray. Employees must disclose any circumstances where the employee or his or her immediate family is an employee, consultant, owner, contractor or investor in any entity that engages in any business or maintains any relationship with the company or provides to or receives from the company any consumer referrals or competes with the J.M. Murray. Employees may not accept, solicit or offer anything of value from anyone doing business with the J.M. Murray without the knowledge of the Compliance Officer and the permission of the Chief Executive Officer.

I. Mission

The mission of the J.M. Murray is to provide services for people with disabilities and their families that enhance the quality of their lives.

J. Expectations

We require that all aspects of Consumer care and business operations are performed in compliance with our mission statement, policies and procedures, professional standards, and applicable governmental laws, regulations, rules and payer standards. The J.M. Murray expects every person and organization that provides human and/or business services to the company to adhere to the highest ethical standards and to promote ethical behavior. Any person or organization whose behavior is found to violate ethical standards will be disciplined appropriately.

Employees, contracted practitioners, volunteers, vendors, and any other agents providing services on behalf of the company are expected to maintain complete, accurate and contemporaneous records as required by the J.M. Murray. The term

“records” includes all documents, both written and electronic, which relate to the provision of the J.M. Murray’s services or provide support for the billing and revenue received for such services. Records reflect the actual service provided. Any records to be appropriately altered must reflect the date of the alteration, the name, signature and title of the person altering the document and the reason for the alteration if not apparent. No person shall ever sign the name of another person to any document. Signature stamps shall not be used, however electronic signatures are permitted through the designated Electronic Medical Record. Backdating and predating documents is unacceptable.

When any person knows or reasonably suspects that the expectations above have not been met, the details must be reported to their immediate supervisor, the Compliance Officer, the Chief Executive Officer, or anonymously by using the dedicated off-site call center phone number, 866-703-5750.

II. Compliance Program Oversight

A. Corporate Compliance Officer

The Board of Directors of the J.M. Murray approves the Corporate Compliance Officer (CCO). The CCO has direct lines of communication to the Chief Executive Officer, the Board of Directors, and the Company’s compliance legal counsel. The CCO is directly obligated to serve the best interests of the J. M. Murray, consumers and employees and is seen as the resource leader regarding regulatory compliance issues. The job duties of the Compliance Officer include, but are not limited to:

1. Developing, implementing, overseeing, and maintaining the compliance plan and all related policies and procedures.
2. Directing and conducting the company’s internal audits established to monitor effectiveness of compliance standards.
3. Providing guidance to management and department leaders regarding policies and procedures, governmental laws, rules and regulations.
4. Actively seek the latest information, materials, and releases regarding regulatory compliance, and through the JM Murray Risk Management Committee, conduct formal periodic reviews of the Compliance Plan, and make any necessary revisions.
5. Developing, implementing, overseeing, and maintaining the company’s compliance training and awareness programs for all employees, contracted practitioners, volunteers, vendors, and members of the Board of Directors.
6. Maintaining a dedicated off-site call center (866-703-5750) to be used for anonymous reporting.

7. Investigating and acting on issues related to compliance and responding to concerns, complaints, and questions related to the Compliance Plan.
8. Conducting internal investigations and ensuring preventative and corrective actions are completed and documented by the Compliance and Services departments.
9. Updates the CEO and the Board of Directors on the status of all investigations, including outcomes related to fraud, waste, and abuse, impact on billing and revenue received or returned, and systemic actions and follow up completed by the Services Leadership.

B. Corporate Compliance Committee

Corporate Compliance Committee (CCC) members are appointed by the Compliance Officer and approved by the Chief Executive Officer. This committee is comprised of senior managers from all areas of the company: including Human Resources, Services, Business Operations, and Administration. Compliance issues are reported by the CCO on behalf of the committee to the CEO and the Board of Directors where appropriate. The CCC's purpose is to advise and assist the Compliance Officer with implementation and maintenance of the Compliance Plan. It should be noted that the JM Murray Risk Management Committee has the responsibility to accomplish the items listed. Some members have a dual role on both committees. The roles of the CCC and Risk Management Committee include:

1. Analyzing the environment where the Company does business, including legal requirements with which it must comply.
2. Reviewing and assessing existing policy and procedure that address these risk areas for possible incorporation into the Compliance Plan.
3. Working with departments to ensure development of written standards, policies and procedures that address specific risk areas and encouraging compliance according to legal and ethical requirements.
4. Reporting on compliance in all areas of the Company.
5. Developing and approving internal systems and controls to carry out compliance standards and policies.
6. Reviewing internal and external audit reports to identify potential non-compliant issues and any associated elevated risk to the Company.
7. Recommending and approving corrective and preventative action plans.

8. Developing a process to solicit, evaluate, and respond to complaints and problems.

C. Board of Directors

The Board of Directors is responsible for approving the Compliance Plan, and all subsequent revisions to the Plan, with input and recommendations from the Corporate Compliance Committee.

III. **Education and Training**

Education and Training are critical elements of the Compliance Plan. Every employee, contracted practitioner, volunteer, and member of the Board of Directors is expected to be familiar and knowledgeable about the company's Compliance Plan and have a solid working knowledge of his or her responsibilities.

The plan, and all applicable compliance policies and procedures will be communicated to employees, contracted practitioners, volunteers, and members of the Board of Directors through required participation in both general and position-specific training programs.

Services leaders are responsible for communication of the terms of the Compliance Plan to all volunteers, vendors and independent contracted practitioners who are acting on behalf of the J.M. Murray.

A. General Training

As part of their orientation, each employee, contracted practitioner, volunteer, and member of the Board of Directors shall receive a written summary of the Compliance Plan, and receive training in the areas of

1. Government and private payer reimbursement principles
2. Government initiatives
3. History and background of Corporate Compliance
4. Legal principles regarding compliance and Board responsibilities related thereto
5. General prohibitions on paying or receiving remuneration to induce referrals and the importance of fair market value
6. Review of existing laws, regulations and protocols applicable to compliance with billing requirements, including:
 - a. A discussion of the Federal False Claims Act
 - b. Administrative remedies for false claims

- c. Any state laws pertaining to civil or criminal penalties for false claims or statements
- d. The whistleblower protections under the Federal False Claims Act and related state laws
- e. The role of such laws in preventing and detecting fraud, waste and abuse in Federal healthcare programs.

B. Position-Specific Training

In addition to the general training, those employees who work in the JM Murray Services Division will receive more specific training on Corporate Compliance as it relates to their positions and responsibilities. When new positions are developed, the Services Leadership will communicate with the CCO to ensure that they are included in this training.

C. Attendance

All education and training related to the Compliance Plan will be verified by attendance and/or a signed acknowledgement of receipt of the training, the Plan and standards. JM Murray conducts the annual plan review through via electronic signature on the designated benefits and information portal, and via written signature where necessary. Attendance at compliance training sessions is mandatory and is a condition of continued employment.

IV. **Effective Confidential Communications**

Open lines of honest and fair communication between the Compliance Officer and employees, contracted practitioners, volunteers, vendors, and members of the Board of Directors are essential to the success of our Compliance Program. Every employee is expected to refuse to participate in any wrongful course of action and to report the actions according the Company's policies and procedures.

A. Reporting Procedure

If an employee, contracted practitioner, volunteer, vendor, or member of the Board of Directors witnesses, learns of, or is asked to participate in potential non-compliant activities, in violation of this Plan, he or she should contact their immediate supervisor, the Compliance Officer, or the Chief Executive Officer. If desired, reports may be made by calling the dedicated off-site call center (866-703-5750). The JM Murray Chief Executive Officer acts as the back up to the CCO, in the event of planned or unplanned time off.

Upon receipt of a question or concern, management shall document the issue at hand and report it to the Compliance Officer immediately. Any questions or concerns relating to potential non-compliance by the Compliance Officer should be reported immediately to the Chief Executive Officer.

The Compliance Officer or designee shall record the information necessary to conduct an appropriate investigation of all complaints. If the employee was seeking information concerning the Code of Ethics or its application, the Compliance Officer or designee shall record the facts of the call and the nature of the information sought. The Compliance Officer or designee shall respond as appropriate. The Company shall, as much as is possible, protect the anonymity of the employee who reports any complaint or question.

B. Protections

The identity of reporters will be safeguarded to the fullest extent possible and will be protected against retaliation. Report of any suspected violation of this Plan by following the above shall not result in any retaliation. Any threat of reprisal against a person who acts in good faith pursuant to his or her responsibilities under the Plan is acting against the Company's Compliance Policy. Discipline, up to and including termination of employment will result if retaliation is proven.

C. Guidance

Any employee may seek guidance with respect to the Compliance Plan or Code of Ethics at any time by following the reporting mechanisms outlined above.

V. Enforcement of Compliance Standards

A. Background Investigations

For all existing and potential employees, contracted practitioners, volunteers, vendors, and members of the Board of Directors who have decision making or other discretionary authority that may involve compliance issues, the J.M. Murray will conduct a reasonable and prudent background investigation prior to serving or acting on the Company's behalf.

Applicants, employees, and others acting on behalf of the Company are required to disclose any name changes and any involvement in non-compliant activities, including health care related crimes.

JM Murray utilizes

Valenz Assurance (<https://www.valenzhealth.com/valenz-assurance/>) to search data from a multitude of government agencies for all persons or businesses who may be excluded from government-funded programs.

The licensure and disciplinary record of the NYS Office of Professional Medical Conduct (Physicians, Physician Assistants).

<http://www.health.state.ny.us/nysdoh/opmc/main.htm>.

The New York State Department of Education (Registered Nurses).

<http://www.op.nysed.gov/home.html>

B. Disciplinary Action-General

Employees who fail to comply with the J.M. Murray's compliance policy and procedures, or who have engaged in conduct that has the potential of impairing the Company's status as a reliable, honest, and trustworthy service provider will be subject to disciplinary action, up to and including termination. Any discipline will be appropriately documented in the employee's personnel file, along with a written statement of reasons for imposing such discipline. Actions taken are reviewed and approved by the Senior Vice Presidents and/or CEO, in conjunction with the Human Resources Department, according to company policy and applicable employment laws and regulations. The Compliance Officer and Senior Vice Presidents shall report any disciplinary actions taken involving the Compliance Plan and investigations to the Board of Directors via the monthly compliance updates on the Board Meeting Agenda.

C. Managerial Roles and Responsibilities

The J.M. Murray's Compliance Program requires that all levels of management promote and practice the elements of the Compliance Program.

Managers and supervisors will be periodically trained in new compliance policies and procedures. In addition, all managers and supervisors will:

1. Discuss with their employees the compliance policies and legal requirements applicable to their job function.
2. Consider compliance with the Plan, policies, and procedures as a factor in evaluating the performance of their employees and agents contracted with and/or acting on the Company's behalf in their areas of responsibility. It should be noted that the JM Murray HR Department has added compliance as a company standard in all job descriptions.
3. Inform all supervised personnel that strict compliance with these policies and requirements is a condition of employment.
4. Disclose to all supervised personnel that the J.M. Murray will take disciplinary action up to and including termination for violation of these policies and requirements.

D. Disciplinary Action-Manager/Supervisory

Managers and supervisors will be held responsible for failure to adequately instruct their subordinates, or for failing to detect noncompliance with applicable policies and legal requirements, where reasonable diligence on the part of the manager or supervisor would have led to the earlier discovery of any problems or violations and would have provided the Company with the opportunity to correct them.

VI. Auditing and Monitoring of Compliance Activities

A. Internal Audits

Ongoing monitoring and oversight are critical in detecting non-compliance and will help ensure the success of the Company's Compliance Program. An ongoing auditing and monitoring system, reporting to the Compliance Officer, and in conjunction with the Corporate Compliance Committee, is an integral component of

our auditing and monitoring systems. This ongoing evaluation shall include the following:

1. Review of relationships with third-party contactors and volunteers, specifically those with substantive exposure to government enforcement actions
2. Review compliance policies and standards
3. Review of documentation and billing relating to claims made to federal, state and private payers for reimbursement, performed internally or by an external consultant as determined by the CCO and the CCC.

The audits and reviews will examine the J.M. Murray's compliance with specific rules and policies through on-site visits, personnel interviews, general questionnaires and consumer record documentation. Specific procedures regarding this area of responsibility are found in the Compliance Plan and Procedures.

B. Plan Integrity

Additional steps to ensure the integrity of the Compliance Plan will include, but not be limited to:

1. Review as needed with legal counsel all records of communications and reports by all employees or contractors kept in accordance with this Plan.
2. The immediate notification of the Compliance Officer in the event of any visits, audits, investigations or surveys by any federal or state company or authority.
3. Forwarding a copy of any correspondence or communication from any regulatory agency charged with licensing the J.M. Murray and/or administering a federally, state or county funded program with which the Company participates to the Compliance Officer.
4. The establishment of a process detailing ongoing notification by the CCO to all appropriate personnel of any changes in laws, regulations or policies, as well as appropriate training to assure continuous compliance. Specific procedures regarding this area of responsibility are found in the Compliance Plan and Procedures.

VII. Detection and Response

A. Violation Detection

The Compliance Officer and the Chief Executive Officer, shall determine whether there is any basis to suspect that a violation of the Corporate Compliance Plan has occurred.

If it is determined that a more detailed investigation is not warranted, the violation will be resolved via channels and mechanisms established by the J.M. Murray s policies and procedures and the funding body’s reconciliation procedures and processes. If advice is sought from a governmental agency, the request and any written or oral response shall be fully documented.

If it is determined that a violation may have occurred, the Compliance Officer and the Chief Executive Officer will determine whether a more detailed internal investigation and/or consultation with the Company’s legal counsel is warranted. A more detailed investigation may include, but is not limited to, the following:

1. Interviews with individuals having knowledge of the facts alleged
2. A review of documents
3. Legal research and contact with governmental agencies for the purpose of clarification

B. Reporting

The Compliance Officer shall report to the Board of Directors regarding each investigation conducted.

At the conclusion of an investigation involving legal counsel, J.M. Murray’s attorney shall issue a report to the Compliance Officer, Chief Executive Officer, and Corporate Compliance Committee, summarizing his or her findings, conclusions and recommendations and will render an opinion as to what action should be taken. Any additional action will be on the advice of counsel.

C. Rectification

If the Company identifies that an overpayment was received from any third-party payer, the reconciliation procedures and processes of the Company and the funding body will be followed. It is our policy to not retain any funds which are received as a result of overpayments.

D. Record Keeping

Regardless of whether a report is made to a governmental agency, the Compliance Officer shall maintain a record of the investigation, including copies of all pertinent documentation. This record will be considered confidential and privileged and will not be released without the approval of the Chief Executive Officer or legal counsel.

VIII. Whistleblower Provisions and Protections

A. Provisions

The False Claims Act provides protection to those employees, independent contractor, or former employee who are discharged, demoted, suspended, threatened or in any other manner discriminated against in the terms and conditions of their employment as a result of their furtherance of an action under the False Claims Act.

JM Murray will not take any retaliatory action against an employee, independent contractor, or former employee if the employee, independent contractor, or former employee discloses information about the non-compliance of JMMurray with any local, state and federal laws and regulations to a regulatory, law enforcement or other similar agency or public official. Protected disclosures are those that assert JM Murray is in violation of a law, rule, regulation, executive order or judicial ruling that created substantial and specific danger to the public health and safety or which constitutes health care fraud under the law; and/or that, in good faith, the employee believes constitute improper quality of consumer care.

B. Protections

The employee's disclosure is protected only if the employee first brought up the matter with either their immediate supervisor, the Compliance Officer, Chief Executive Officer or the employee compliance hot-line and gave the employer a reasonable opportunity to correct the alleged violation, unless the danger is imminent to the public or consumer and the employee believes in good faith that reporting would not result in corrective action.


IX. Signatures



Miranda Smith
Corporate Compliance Officer

3/23/2026

Date



Ernest Dodge
President/CEO

3/17/2026

Date



Jason Pomeroy
Chairman of the Board

3/17/26

Date

X. Pre-Release Revision History and Revision History

PRE-RELEASE REVISION HISTORY

Revision	Date	Section	Description of change	Author Initials	Approved By	Approval Date
A	11-7-07	II.B II.C II.D Revision Page	Changed name of Compliance Committee to Agency Compliance Committee. Moved C. Delegation of Substantial Discretionary Authority to Section V.A. Renamed Section C and added Board of Director roles and responsibilities. Added Section D: Board Compliance Committee roles and responsibilities. Added revision history page, pre-release and post-release.	FAM		12/19/07
B	5/14/08	Signature Page	Changed Compliance Officer, President and Chairman of the Board to reflect name changes due to management changes.	FAM		5/14/08

REVISION HISTORY

Revision	Date	Section	Description of change	Author Initials	Approved By:	Approval Date
A			Original. Initial release.			
B	11/05/2009	VIII	Added section VIII Whistleblower Provisions and Protections	DED	Board	11/18/2009
C	12/2018		Combined Board and Agency Compliance Committee Updated Signatures	BAA		
	2/24/2020		Updated exclusion check website address	BAA		
	10/4/2021		Updated information on education and training Provided information on the role of the JMM Risk Management Committee Update website for exclusion screening http://www.op.nysed.gov/home.html Addition of structure and procedures for Compliance Department	BAA		
D	1/18/2022	V	Change of title from COO to EVP	BAA		
	2/15/2022	VIII	Added new language to include contractors and former employees	RSE		
E	3/1/2023	IX	Update to signature page with change of CCO	BAA		
F	3/5/2024	V IX	Updates made- Job titles were changed & BCC removed	MCS	RMC	3/5/2024
	3/19/2024		BOD approval of revision	MCS	BOD	3/19/2024
G	3/4/2025	II IV	Added HR & capitals to titles. Removed EVP and added CEO	MCS	RMC	3/4/2025
	3/18/2025		BOD approval of revision	MCS	BOD	3/18/2025
H	3/3/2026	Throughout	Removal of "Center, Inc." or "Center" and changed name of BOD Chairman in Signature section	MCS	RMC	3/3/2026
	3/17/2026		BOD approval	MCS	BOD	3/17/2026

