

STANDARDS OF CONDUCT POLICY

Mission:

To provide services for people with disabilities and their families that enhances the quality of their lives.

Intent:

J.M. MURRAY's (JMM) Standards of Conduct (Standards) applies to all employees, Board of Directors, volunteers, and independent contractors.

These Standards were approved by the J.M. MURRAY's Board of Directors and is a formal statement of JMM's commitment to the standards and rules of ethical conduct.

JMM is committed to preventing the occurrence of unethical or unlawful behavior, stopping such behavior as soon as possible after discovery, and to discipline employees who violate these Standards, including employees who neglect to report a violation.

All employees must comply with these Standards, immediately report any alleged violations of wrongdoing, and assist management and compliance personnel in investigating allegations of wrongdoing.

While these standards addressed in these Standards are intended to guide employees in the course of their day-to-day responsibilities, they do not replace any JMM or program policies and procedures. There may be instances that are not addressed by these Standards or existing policies and procedures, or activities that may conflict with these standards. Employees must seek direction from their supervisor, other JMM management staff, or the Corporate Compliance Officer (CCO) in these instances.

Ethics

It is the policy of JMM to observe all laws and regulations applicable to its business and to conduct business with the highest degree of integrity. To accomplish this, all employees and contractors must obey the laws and regulations that govern their work and always act in the best interest of the people we serve, their families and JMM.

JM Murray has adopted the "National Alliance for Direct Support Professionals Code of Ethics" for our direct support staff. This will give staff a resource to follow when providing direct support to our consumers and trainees. There are nine ethical principles, as follows:

1. **Person-Centered Supports:** As a Direct Support Professional (DSP), my first allegiance is to the person I support; all other activities and functions I perform flow from this allegiance.
2. **Promoting Physical and Emotional Well-Being:** As a DSP, I am responsible for supporting the emotional, physical and personal well-being of the individuals receiving support. I will encourage growth and recognize the autonomy of the individuals receiving support while being attentive and energetic in reducing their risk of harm.
3. **Integrity and Responsibility:** As a DSP, I will support the mission and vitality of my profession to assist people in leading self-directed lives and to foster a spirit of partnership with the people I support, other professionals and the community.
4. **Confidentiality:** As a DSP, I will safeguard and respect the confidentiality and privacy of the people I support.
5. **Justice, Fairness and Equity:** As a DSP, I will promote and practice justice, fairness and equity for the people I support and the community as a whole. I will affirm the human rights, civil rights and responsibilities of the people I support.
6. **Respect:** As a DSP, I will respect the human dignity and uniqueness of the people I support. I will recognize each person I support as valuable and help others understand their value.
7. **Relationships:** As a DSP, I will assist the people I support to develop and maintain relationships.

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8. Self-Determination: As a DSP, I will assist the people I support to direct the course of their own lives.
9. Advocacy: As a DSP, I will advocate with the people I support for justice, inclusion and full community participation.

The complete Direct Support Professionals Code of Ethics can be found at <https://www.nadsp.org/> with examples of each of the nine points above.

Guidelines for employees, Board members, and contractors:

- You are expected to keep management staff informed of what you are doing; to document or record all services or transactions accurately; and to be honest and forthcoming with JMM, regulatory agencies, and internal and external auditors.
- You are expected to comply with JMM policies and procedures, accounting rules and internal controls.
- You are expected to function with honesty in your work for JMM and with people we serve, providers, suppliers and all others with whom JMM does business.

Conflict of Interest

Employees and contractors must not allow any outside financial interest, or competing personal interest to influence their decisions or actions taken on behalf of JMM.

Employees and contractors must avoid any situation where a conflict of interest exists or might appear between their personal interests and those of JMM. The appearance of a conflict of interest may be as serious as an actual conflict of interest.

Guidelines for employees, Board members, and contractors:

It is a conflict of interest for you to personally take for yourself opportunities that are discovered through the use of JMM property, information or position with JMM; to use JMM property or information for personal gain; or to compete with JMM.

There are many types of situations where potential conflicts may occur at JMM. You must promptly report any actual or potential conflicts of interest to your immediate supervisor or directly to the CCO.

Outside Activities and Employment

- You may not conduct outside activities during work time. Such activities interfere with your regular duties and negatively impact the quality of your work.
- You are a representative of JMM in your every day life and must represent JMM positively in the community.
- Outside employment must not conflict in any way with your responsibilities to JMM or individuals served. You may not compete against JMM, work for its competitors, or have any ownership interest in a competitor.
- If you are involved in any activity or relationship that would give the appearance of a conflict of interest, you must report this to your supervisor.

Use of JMM Funds and Resources

- JMM assets are to only be used for the benefit of the JMM and the individuals served. Assets include funds, equipment, inventory and office supplies, but also concepts, business plans and strategies, information about individuals served, financial information, computer property rights, and other business information about JMM.

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- You may not use JMM assets for personal gain or give them to any other persons or entities, except in the ordinary course of business as part of an approved transaction.

Confidentiality

- During your employment, you may acquire confidential information about JMM, its staff and individuals served that must be handled in strict confidence and not discussed with outsiders. The protection of confidential business, staff and consumer information is very important.

Business Dealings between JMM and Employees

- JMM will not be inappropriately influenced with goods or services from any business in which you or your immediate family members have a substantial interest.
- Property and resources of JMM should only be used for the benefit of JMM or the people we serve.

Maintenance of Records

Employees and contractors must record and report all consumer and financial information fully, accurately and honestly. Records include, but are not limited to records of individuals served, documentation of services, accounting books or records, financial statements, timesheets or records, expense reports, vouchers, bills, payroll, claims payment records, correspondence and any other method of communication. Employees or contractors must not omit or conceal any relevant information.

Guidelines for employees, Board members, and contractors:

Many of JMM forms are legal documents used to prove that a service was provided, to bill for a service to an individual, to record a job task, or to record specific happenings. You must document accurately and honestly, and only for those services that you provided or those events you were involved in.

Falsification of Records

- You must not make any false entries in any of JMM's records or in any public record for any reason.
- You may not alter any permanent entries in JMM's records.
- You may only approve payments or receipts on behalf of JMM that are described in documents supporting the transaction. "Slush funds" or similar off-book accounts, where there is no accounting for receipts or expenditures on JMM's books, are strictly prohibited.
- You may not create or participate in the creation of any records that are intended to mislead or to conceal anything that is improper.

Expense Records

- You must always charge expenses accurately and to the appropriate cost center or account, regardless of the financial status of the program, project or contract, or the budget status of a particular account or line item.

Retention of Records

- The retention, disposal or destruction of records of or pertaining to JMM must always comply with legal and regulatory requirements and JMM policy.
- You may not destroy records pertaining to litigation or government investigations or audit without express written approval of the CCO.

Protection of Confidential Information

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JMM has developed policies and procedures to assure that the confidentiality of JMM information and information about the people we serve is protected and released only with the appropriate authorization or for lawful reasons, in addition to purposes of treatment, payment and operations. All employees and contractors are required to comply with JMM's Privacy Policy. If you have any questions concerning confidential information or the Privacy Policy contact your immediate supervisor or the CCO.

Guidelines for employees, Board members, and contractors:

You must treat all JMM records and information as confidential.

You may not release confidential information without the proper authorization. Confidential information includes not only information about the people that we serve and their families, but also non-public information about JMM that may be of use to JMM's competitors or harmful to JMM or its customers if released.

You must protect JMM's information and avoid discussing or disclosing JMM information, purposefully or inadvertently (through casual conversation), to any unauthorized person inside or outside JMM. Furthermore, staff may not share confidential JMM information with anyone, except where required for a legitimate business purpose.

JMM information may not be removed from JMM property without permission from a supervisor or administrator with proper authority over the information. Ask your supervisor if you are not sure whether certain information is confidential.

Termination of Employment

- You may not use any confidential information gained from your employment with JMM for your or another company's benefit. You may not take copies of any reports, documents or any other property belonging to JMM.
- Upon termination of employment with JMM, you must return all JMM property including, but not limited to, copies of documents, notes, and other records containing confidential information; laptops, tablets, cell phones; building access cards; keys and any other company property.

Information Security

- You are responsible for properly using information stored and produced by all of JMM's computer systems.
- Computers, Internet access, email, or other office communications systems are intended for business-related purposes only and not for uses that may be disruptive, offensive, harassing or harmful to others.
- Do not share your system user name or password with another person or allow another to access the computer with your password.
- All employees and contractors are required to comply with JMM's information technology policies and procedures. If you have any questions concerning information security, contact your immediate supervisor or the CCO.

Fair Dealing

Conducting business with providers, contractors, suppliers, people we serve, and competitors may pose ethical problems. Employees and contractors are expected to deal fairly with providers, contractors, people we serve, and competitors.

These Standards and the following guidelines are intended to help you make appropriate, responsible and correct decisions in these and all matters:

Kickbacks and Rebate

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- Kickbacks and rebates in cash, credit or other form are prohibited. They are not only unethical, but in many cases, illegal.

Gifts and Gratuities and Entertainment

- You may not solicit money, gifts, gratuity or any other personal benefits or favors of any kind from providers, contractors, producers, accounts, or people we serve and their families.
- You must not offer or accept entertainment that is not a reasonable addition to a business relationship but is primarily intended to gain favor or to influence a business decision.
- **NOTE: JMM may agree to allow gifts of nominal value from people served and their families and/or non-monetary gifts from business partners. Should you be faced with any such situation, notify your supervisor.**

Agreements with Contractors and Vendors

JMM must assure that any agreements with contractors and vendors clearly and accurately describe the services to be performed or items to be purchased. Performance standards, and the applicable compensation, if any, must be reasonable in amount, not be excessive in terms of industry practice and must equal the value of the services rendered. The agreement must also inform the contractor or vendor they must abide by all JMM Compliance policies.

Improper Use of Funds or Assets

Use of JMM's funds or assets for any improper purpose is strictly prohibited. If you are aware of or have reason to believe that funds or assets are being improperly used, you must report this immediately to your supervisor or the CCO.

Federal and State Programs

JMM is committed to complying with the laws and regulations that govern the federal and state programs that it administers. Policies and procedures, the Compliance Program and these Standards of Conduct are developed to provide guidance in your day-to-day work. You must abide by the policies and procedures and the standards set by JMM.

Governmental Investigations

There may be times that JMM is asked to cooperate with an investigation by a federal or state governmental agency, or to respond to a request for information. A request may be formally addressed to JMM or an individual within JMM. Employees and contractors must report any requests for information or cooperation with an investigation to the CCO immediately.

Political Activities and Contributions

Because JMM is a non-profit organization, it is prohibited from engaging in any political campaign activities and a "substantial" amount of lobbying. Nothing in the policy is meant to limit the constitutional rights of employees in the exercise of their rights associated with private political activities and contributions.

Guidelines for employees, Board members, and contractors:

JMM funds and resources, including your work time, may not be used for political contributions or activities.

You may not act as a representative of JMM in any political campaign activity. In expressing your personal political views or support or opposition of a candidate for public office, it must be very clear that you are expressing your personal view, support or opposition as an individual and not a representative of JMM.

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Laws and regulations prohibit a “substantial” amount of lobbying. There are allowances for JMM to advocate its position on public issues. To assure that JMM does not violate any laws or regulations, or risk losing its tax-exempt status, you must seek prior approval from the CCO before engaging in any lobbying activities. The CCO **may need to** consult with legal counsel on the matter and will need to record the amount of time spent in lobbying activities.

Employment Environment

JMM is committed to creating a safe and professional workplace where employees and others are treated with respect and without regard to their race, sex, age, religion, national origin, color, marital status, disability, or other protected characteristics. Business integrity, teamwork, trust and respect are JMM’s most important values. Unlawful discrimination or harassment of any sort violates these values. All JMM employees must exhibit and promote respect, integrity, trust and teamwork in the workplace and must comply with this policy prohibiting discrimination and harassment in all facets of JMM’s work

Guidelines for Employees, Board members, and Contractors:

All employees are required to support JMM’s commitment to a safe and professional work environment and to demonstrate appropriate behavior in the workplace. All employees and contractors are prohibited from discrimination, harassment, including sexual harassment, and retaliation. You are responsible for understanding JMM’s policy prohibiting discrimination harassment, including sexual harassment, and retaliation. You should consult with an appropriate supervisor or administrator if you have questions about your right to a workplace free from unlawful harassment or discrimination or if you have questions about your duty to avoid discrimination.

Seeking Guidance and Reporting Violations

Employees and contractors must report any actual or suspected violations of these Standards, any applicable law or regulation, or any JMM policy and procedure to their immediate supervisor or the CCO. A Compliance Hotline is also available for confidential or anonymous reporting of such issues. The Compliance Hotline telephone number is **866-703-5750**. This hot line is monitored by a third party. The phone of the CCO is 607-756-2743. If the CCO is suspected of a violation, notify the President at 607-758-1904.

When an actual or suspected violation of these Standards, any applicable law or regulation, or any JMM policy and procedure is reported to any JMM employee, it must be promptly referred to the CCO. Steps will be taken to protect confidentiality and anonymity, when appropriate and warranted. JMM will not tolerate any form of retaliation against a person who makes a good-faith report in accordance with these Standards.

All employees, Board members, and contractors must cooperate fully and honestly in any investigation into a reported violation of these Standards, any applicable law or regulation, JMM policy, procedure or practice.

Corrective Action and/or Discipline: Please refer to the JM Murray Employee Handbook for the policy on supervisory and disciplinary actions for violations of Corporate Compliance policies.

Your Responsibilities

- ✓ Attend required training, and read and understand **J. M. MURRAY**. Corporate Compliance Plan, Corporate Compliance Policies and Procedures, and these Standards of Conduct.
- ✓ Follow the **J. M. MURRAY** Standards of Conduct and abide by all policies and procedures, guidelines, and Federal and State laws and regulations.
- ✓ Be alert to any situation that could violate **J. M. MURRAY** Standards of Conduct, policies and procedures, guidelines, and/or federal and state laws and regulations.

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- ✓ Promptly report any issues, concerns, violations or suspected violations to your supervisor, other management staff, Director of Human Resources, CCO, or the President.

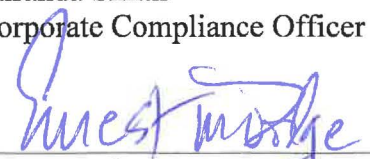
Approval:



Miranda Smith
Corporate Compliance Officer

3/23/2026

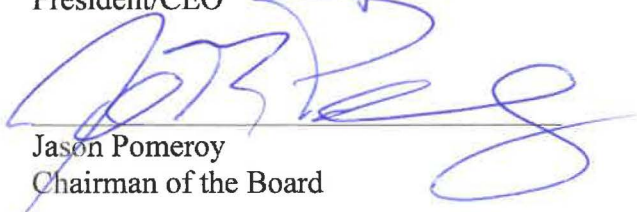
Date



Ernest Dodge
President/CEO

3/17/2026

Date


Jason Pomeroy
Chairman of the Board

3/17/2026

Date

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REVISION HISTORY

Revision	Date	Section	Description of change	Author Initials	Approved By:	Approval Date
A	6/24/2008		Original. Initial release.			6/24/2008
B	7/18/2023	Revision	Policy was revised with updates	MCS	RMC	7/18/2023
C	3/5/2024	Review	Annual review & no changes	MCS	RMC	3/5/2024
D	3/19/2024	Approval	BOD review & approval	MCS	BOD	3/19/2024
E	3/4/2025	Review	Annual review & no changes	MCS	RMC	3/4/2025
F	3/18/2025	Approval	BOD review & approval	MCS	BOD	3/18/2025
G	3/3/2026	Revision	Removal of "Center, Inc." and "C" from JMMC, name change of Chairman	MCS	RMC	3/3/2026
H	3/17/2026	Approval	BOD review & approval	MCS	BOD	3/17/2026