



CODE OF CONDUCT

ADOPTED ON THIS 23rd DAY OF November 2024

- 1) **PURPOSE:** Marian Homes, Inc. (MHI), a registered 501(c)(3) Non-Profit Organization, adopts this Code of Conduct. Each of us is expected to maintain the highest standard of ethical conduct when acting on behalf of MHI. We are responsible for knowing the laws and regulations of the localities in which we operate or for which we are responsible, as well as the Organization's policies that apply to our work and by which we are expected to abide. The Board of Directors is responsible for setting a good example and being accountable for the actions of anyone who reports to them. You are expected to comply with both the letter and spirit of this Code of Conduct. It is your responsibility to seek clarification about the application of this policy to a specific situation. You will not lose your position or be mistreated for raising questions about the Organization's policies and conduct. You also are required to cooperate fully with any authorized internal or external investigations. Making false statements to or otherwise misleading internal or external auditors, legal counsel, or any person charged with handling the investigation is grounds for your immediate dismissal from Marian Homes. If you violate the law or the Organization's policies or deliberately withhold information during an ethics investigation, you will be subject to disciplinary action, possibly including dismissal.
- 2) **APPLICABILITY:** This Code of Conduct applies to:
 - a) All Volunteers with the Organization, regardless of position/title.
 - b) Any future Professional Staff as the Board of Directors sees fit to put into such a position.
- 3) **ACTIVE PARTICIPATION**
 - a) Board Members- Board Members are expected to actively participate in monthly meetings, fundraising events and ad hoc meetings as scheduled.
 - b) House Captains- are expected to visit their assigned home no less than once monthly and update the Operations Chair of any needed repairs or concerns.
 - c) Volunteers- perform duties as assigned by the Board as needed
- 4) **CONFLICT OF INTEREST**
 - a) The MHI Conflict of Interest Policy is incorporated herein by reference.
 - b) The most recently adopted Conflict of Interest Policy is applicable.



- 5) PROHIBITION AGAINST HARASSMENT of any kind:
 - a) Sexual
 - b) Physical
 - c) Verbal
 - d) Media-based
- 6) CONFIDENTIALITY The attached Confidentiality Agreement is incorporated herein by reference.
- 7) WHISTLE BLOWER POLICY: The attached Whistle Blower Policy is incorporated herein by reference for all Board Members and Volunteers.
- 8) BOOKS AND RECORDS: MHI records must accurately and clearly reflect the facts of the underlying matter. All records must be kept so that an accurate, auditable record of all transactions is maintained in accordance with generally accepted accounting principles. Improper, intentionally incomplete, or fraudulent documentation or reporting is contrary to the MHI policy. No entries may be made to intentionally hide or disguise the true nature of any transaction or to create funds to be used for other purposes. Information that you record and submit to other parties—whether inside or outside MHI must be accurate, timely, and complete. Reports cannot be used to mislead or conceal anything from their intended audience. This accuracy requirement applies to financial and non-financial records, such as insurance claims, safety statistics, and other reports. All records must be maintained according to the records management policy and the records retention schedule. You must use common sense and observe standards of good taste regarding content and language when creating business records and other documents (such as e-mail) that may be retained by MHI or a third party. You should remember that this record may become public at a future date.
- 9) ORGANIZATION FUNDS: You must use reasonable care to protect and safeguard all of the assets that MHI has entrusted to you, and use the same care you would to protect your own personal assets under similar circumstances. You are responsible for the careful, cost-conscious, and effective use of MHI funds. When using expense accounts of MHI you must fully and clearly document all expenses in accordance with the Organization's policy. You must not remove any equipment without prior permission. Regardless of its current usage or condition, you may not sell, loan, give away, or otherwise dispose of the Organization's property without proper authorization consistent with applicable procedures.

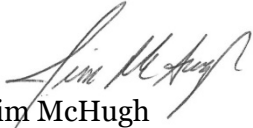


10) **POLITICAL ACTIVITY:** As a nonprofit organization with tax-exempt status, Marian Homes, Inc. MHI is prohibited from using its assets to endorse political candidates, mobilize supporters to elect or defeat candidates, or align itself with political parties. However, this does not mean that you cannot be involved in political activity as a private individual.

You may not use MHI property or other assets on behalf of or against any candidate for office. You should also be clear that any political statements you make, such as an endorsement of a candidate, are made in your personal capacity and not in your capacity as a representative of the Organization, and that the statements should not be made at an event sponsored or hosted by MHI or in one of its publications.

Lobbying activity generally includes attempts to influence the passage or defeat or legislation and is distinguished from providing general information for the purpose of educating the public. Lobbying by nonprofits is restricted, and it may trigger registration and reporting requirements. The federal government and many states extend the definition of lobbying activity to cover efforts to influence rulemaking by executive branch agencies or other official actions of agencies, including the decision to enter into a contract or other financial arrangement. Therefore, you should not engage in any activities that could be considered lobbying without the express permission of the Board of Directors.

This Code of Conduct is hereby adopted by the Board of Directors of Marian Homes, Inc.


Jim McHugh
President, Marian Homes, Inc.

Date: November 24, 2024