

CODE OF ETHICS

JOHN MILTON MANOR CORPORATION

I. Integrity

All directors, officers, employees, and volunteers of John Milton Manor Corporation shall act with honesty, integrity, and openness in all their dealings as representatives of John Milton Manor Corporation. John Milton Manor Corporation shall maintain a working environment that values integrity, fairness, and respect.

II. Mission and Vision

Our mission is to promote the general welfare of blind or visually impaired individuals and families by providing housing assistance which enables them to live independently.

We pursue our mission by managing various rental properties where blind or visually impaired tenants can live independently in affordable housing

Our Vision is to grow our organization in the hope of developing new properties and innovative programs such as rental vouchers or down payment assistance to enable us to aid a greater number of blind or visually impaired people in our communities.

III. Governance

The Board of Directors is responsible for setting the mission and the strategic direction of John Milton Manor Corporation and for exercising oversight of its finances and policies. The Board of Directors shall:

- Ensure that Board members possess the requisite skills and experience to carry out their duties and that all directors understand and fulfill their governance duties, acting for the benefit of John Milton Manor Corporation and its public purpose.

- Adopt and implement a Conflict-of-Interest Policy so that conflicts of interest, as well as the appearance of conflicts of interest are prevented or effectively managed through disclosure, recusal, or other means.
- When funds are available to sustain all monetary obligations as an employer, be responsible for the hiring and regular performance review of the Executive Director and ensure that the compensation of the Executive Director is reasonable and appropriate.
- Ensure that the Executive Director and any appropriate staff provide the Board of Directors with timely and comprehensive information so that the Board of Directors can effectively carry out its duties.
- Ensure that John Milton Manor Corporation conducts all transactions and dealings with integrity and honesty.
- Ensure that John Milton Manor Corporation promotes working relationships with Board members, management team, staff, and volunteers based on mutual respect, fairness, and openness.
- Ensure that John Milton Manor Corporation is fair and inclusive in its hiring and promotion policies and practices for all Board, management team, staff, and volunteer positions.
- Ensure that key policies of John Milton Manor Corporation are in writing, clearly articulated, and adopted.
- Ensure that the resources of John Milton Manor Corporation are responsibly and prudently managed.
- Ensure that John Milton Manor Corporation has the capacity to carry out its programs effectively.

IV. Law and Ethics

John Milton Manor Corporation shall comply with all applicable federal, state, and local laws and regulations and shall seek the advice of counsel when necessary or appropriate. Compliance with the law, however, is the minimum standard of expected behavior. John Milton Manor Corporation shall also adhere to the highest ethical standards. All resolutions and other legal actions by the Board of Directors shall satisfy two requirements: (1) they shall be legally permissible, and (2) they shall also reflect the highest ethical standards as determined by the Board of Directors in the exercise of its sole discretion.

V. Stewardship

In managing its funds responsibly and prudently, John Milton Manor Corporation shall:

- Devote a reasonable percentage of its annual budget to programs in pursuance of its mission.
- Incur administrative costs adequate to ensure effective accounting and legal compliance systems, internal controls, competent staff, and other expenditures critical to professional management.
- Pay compensation, in return for services, which is reasonable but not excessive.
- Avoid accumulating John Milton Manor Corporation funds excessively.
- Draw prudently from restricted funds in a manner consistent with the restrictions.
- Follow spending practices and policies that are fair, reasonable, and appropriate to fulfill the mission of John Milton Manor Corporation.

VI. Diversity

John Milton Manor Corporation shall promote diversity and inclusiveness in its Board of Directors, management team, staff, and volunteers.

VII. Evaluation

John Milton Manor Corporation is committed to improve, continually, its public programs and its organizational quality. John Milton Manor Corporation shall periodically review its program and incorporate lessons learned into future programs. John Milton Manor Corporation shall be responsive to new developments in its field of activity and shall be responsive to the interests of its audiences and other constituencies. John Milton Manor Corporation shall develop and implement a three-tier evaluation procedure whereby the performance of the Board of Directors as a whole, each Board committee, and each director evaluated periodically.

VIII. Fundraising

John Milton Manor Corporation shall comply with the fundraising requirements of California's Nonprofit Integrity Act of 2004. John Milton Manor Corporation shall respect the privacy concerns of individual donors and shall follow donor intent in making expenditures. John Milton Manor Corporation shall disclose important and relevant information to potential donors. In raising funds from the public, John Milton Manor Corporation shall:

- Inform donors of the mission of John Milton Manor Corporation, how resources are used, and the integrity of John Milton Manor Corporation causing donations to be used effectively for their intended purposes.
- Inform donors of the identity of those serving on John Milton Manor Corporation's Board.
- Disclose John Milton Manor Corporation's most recent financial reports.
- Represent contributions are used for the purposes for which they were given.
- Provide appropriate acknowledgement and recognition of contributions.
- Treat information about donations with respect and with confidentiality to the extent provided by the law.
- Provide an opportunity for donors to delete their names from mailing lists.

- Encourage donors to ask questions when donating, and provide prompt, truthful, and forthright answers.

IX. Transparency

John Milton Manor Corporation shall provide comprehensive and timely information to the public, the media, and all stakeholders and shall be responsive in a timely manner to reasonable requests for information. All information about John Milton Manor Corporation shall fully and honestly reflect the policies and practices of John Milton Manor Corporation. All solicitation materials shall accurately represent John Milton Manor Corporations' policies and practices. All financial and program reports shall be complete and accurate in all material aspects.

The following governance documents are posted on John Milton Manor Corporation's website: Articles of Incorporation, Bylaws, Conflict of Interest Policy, Code of Ethics, Gift Acceptance Policy, Whistleblower Notice and Policy, and Document Management Policy, along with audited financial statements and Form 990 for the most recent three years. The website shall invite comments by readers regarding any governance document, and the readers will be encouraged to download any documents that may be useful to their nonprofit organization.

X. Confidentiality

All directors, officers, employees, and volunteers have a duty to safeguard information that is proprietary to John Milton Manor Corporation. Information about John Milton Manor Corporation that is confidential or proprietary and obtained by a director, officer, employee, or volunteer because of such person's association with John Milton Manor Corporation may not be disclosed to third parties unless expressly authorized by John Milton Manor Corporation.

XI. Complaints

Any person, whether connected with John Milton Manor Corporation, may lodge a complaint of unethical conduct against a director, officer, employee, or volunteer of John Milton Manor Corporation by filing such complaint, written or oral, with any director or officer.

XII. Remedies

Any director who fails to comply with this Code of Ethics may be, at the discretion of the Board of Directors, removed from the Board. If any employee or volunteer fails to comply with this Code of Ethics, said person may be on notice or terminated, at the discretion of the Board President or the Board of Directors.

XIII. Annual Affirmation Statement

John Milton Manor Corporation shall provide a copy of this Code of Ethics to every director, officer, employee, and volunteer. Each year the Annual Affirmation Statement, attached, shall be signed by each director, officer, and employee, affirming that such person has received a copy of this Code of Ethics, has read, and understands it, and agrees to comply with it. Volunteers are not required to sign and submit such a Statement but are encouraged to comply with its intent.

All Annual Affirmation Statements shall be submitted to the Board President and then filed with the minutes of the first meeting of the Board of Directors held each year after January 31.

ANNUAL AFFIRMATION STATEMENT

JOHN MILTON MANOR CORPORATION

The Code of Ethics of John Milton Manor Corporation requires an annual affirmation that you have received, read, understand, and agree to comply with the Code of Ethics.

Please complete and sign this Annual Affirmation Statement indicating your affirmation as described above.

Please return this Statement to the Board President of John Milton Manor Corporation each year by July 31.

Please indicate your position with John Milton Manor Corporation:

Board of Directors, Officer

Board of Directors, Member

Employee

Signature: _____

Date: _____