

All of the following policies can be found in DC Prep's Employee Handbook

## a. Sexual harassment

### STATEMENT OF POLICY AND PROCEDURE ON HARASSMENT

DC Prep is committed to maintaining a work environment that is free of harassment or intimidation. In keeping with this commitment, DC Prep will not tolerate harassment of employees by anyone, including any supervisor, coworker, vendor, or visitor to DC Prep's premises.

Harassment consists of a pattern of unwelcome or discriminatory conduct, whether verbal, physical or visual, that is based upon an individual's sex, race, color, religion, national origin, age, disability, veteran's status or other classification protected by law, which is so severe and pervasive that it interferes with an individual's performance. DC Prep will not tolerate harassing conduct that affects any aspect of an employee's work environment.

While all the referenced types of harassment are prohibited, sexual harassment deserves special explanation. Harassment because of sex is prohibited both in opposite sex and same sex situations, regardless of the sexual preference of the individuals involved. Sexual harassment can include, among other things, unwelcome sexual advances, requests for sexual favors, and other physical, verbal, or visual conduct because of or on the basis of sex constitute sexual harassment when:

1. Submission to such conduct is made either an explicit or implicit term or condition of an individual's employment;
2. Submission to or rejection of such conduct by an individual is used as a basis for an employment decision affecting such individual; or
3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Any individual either experiencing or observing a suspected incident of harassment should report the incident to the Principal or Supervisor. If the Principal or Supervisor is involved in the conduct, then complaints should be made to the Director of People Operations or CTO.

All complaints of sexual or other forms of harassment will receive prompt attention. It is DC Prep's policy to investigate all such complaints thoroughly, promptly, and in an impartial manner. If such an investigation reveals that the complaint is valid, DC Prep will administer disciplinary or other corrective action as appropriate to stop the harassment and prevent its recurrence. Such disciplinary action may include immediate termination of employment. Discipline will be based on the seriousness of the offense. To the fullest extent practicable, DC Prep will use discretion regarding the dissemination of information regarding complaints, related investigations and the terms of their resolution. Retaliation against victims or witnesses is strictly prohibited.

The above procedures as outlined with regard to claims of sexual or other forms of harassment shall apply equally and in full force to complaints alleging other forms of harassment.

All DC Prep employees are responsible for helping to ensure that DC Prep and DC Prep employees successfully avoid harassment and its effects. An environment free of harassment is more enjoyable, and more conducive to providing a quality learning experience. As always, DC Prep strives for excellence in DC Prep's service, achievement, and conduct.

## **b. Equal opportunity**

### **EQUAL EMPLOYMENT OPPORTUNITY**

DC Prep is committed to providing equal employment opportunity to all applicants and employees in full compliance with all District of Columbia and Federal laws prohibiting discrimination on the basis of race, color, religion, sex, national origin, genetic information, age, disability, marital status, sexual orientation, veteran status or any other status protected by law. This policy applies to all aspects of employment including recruitment, hiring, promotion, transfer, benefits, layoff, demotion, discipline, and discharge. This policy also applies to the use of all facilities and participation in all DC Prep sponsored activities. Supervisors as well as all employees will be expected to comply with this policy in every respect.

Any employee who has a question or concern about any type of discrimination or harassment is encouraged to bring it to the attention of the Principal or their supervisor. Complaints about the actions of a Principal or supervisor in this regard should be made to the Director of People Operations, Chief Academic Officer ("CAO"), Chief Talent Officer ("CTO"), or Chief Executive Officer ("CEO"). Complaints about the actions of the CEO in this regard should be made to the Chair, Secretary or Treasurer of the Board of Directors of DC Prep. There will be no retaliation, harassment or intimidation of any employee who makes a good-faith complaint.

## **c. Drug-free work place**

### **DRUG-FREE WORKPLACE**

Team members, agents and contractors shall not engage in the unauthorized use, possession or sale of alcohol or illegal drugs during work hours, within DC Prep property or in a DC Prep vehicle or any time when conducting DC Prep business, nor shall they report to work under the influence of such substances, or display evidence of having used such substances. Further, as role models for DC Prep's students and as representatives of DC Prep, its employees, agents and contractors shall not engage in the unlawful use, possession or sale of controlled substances during their off-duty hours.

When appropriate, in addition to any disciplinary actions that may be taken in accordance with the Disciplinary Action section of this Employee Manual, violators of this policy may be referred to the appropriate police and legal authorities for prosecution.

Although marijuana is decriminalized in Washington, D.C. and in several other states, it remains a controlled substance under federal law. It is therefore important to note that federal law and DC Prep policy continue to treat marijuana and cannabis as illegal and prohibited despite changes in some state laws. Federal laws that prohibit any use of marijuana and other cannabis products, including medical use, have not changed and take precedence over laws in States that have chosen to legalize either medical or recreational use of marijuana or other cannabis products. In addition, DC Prep receives federal funding and as such must abide by additional regulations requiring that recipients prohibit use or possession of drugs in the workplace. Finally, note that if an illegal drug is legalized even at the federal level and even for medical use, DC Prep will still continue to prohibit its use or possession at work—or reporting to work under its influence—as is the case with alcohol.

Candidates for employment may be asked to submit to alcohol, drug and controlled substance testing prior to hiring or any time during their employment with DC Prep. Team members who fail a drug test either prior to hiring or any time during their employment with DC Prep may be terminated for cause from DC Prep.

## d. Staff complaint resolution process

### OPEN COMMUNICATION AND DISPUTE RESOLUTION

#### OPEN COMMUNICATION POLICY

Employees should discuss any interpersonal issue with a co-worker directly. If a resolution is not reached, the employees should arrange a meeting with the Principal or their supervisor to discuss any concern, problem, or issue that arises during the course of employment. Retaliation against any employee for good-faith usage of open communication channels is unacceptable. In the event that the Principal or the employee's supervisor is unable to resolve the employee's questions or problems, or if an employee feels uncomfortable discussing this problem with the Principal or the employee's supervisor, an appointment may be made with the CTO.

While the Open Communication Policy is intended to promote conflict resolution through respectful employee dialogue, any employee who has a question, concern or feels that he/she has been subject to any type of discrimination, harassment or other inappropriate workplace behavior should immediately inform either the Principal or the Director of People Operations.

#### DISPUTE RESOLUTION POLICY

For matters not involving concerns about harassment, discrimination or other inappropriate workplace behavior, if an employee has a complaint about a particular situation or person, the employee, if comfortable in doing so, should talk to the person who seems to be causing the situation or with whom the employee has the complaint. If the employee is unable to resolve the employee's complaint through a conversation with that individual, the employee should notify the offending employee's supervisor in writing that the employee wishes to begin a complaint process and would like a meeting with the supervisor. If the conversation with the supervisor does not resolve the complaint, the employee may present the complaint in writing to the Director of Talent Management. If the conversation with the Director of Talent Management does not address the concern, a final appeal may be made in writing to the CTO of DC Prep. Complaints from individuals that have not followed these previous steps will not be acknowledged. Each individual will have 48 hours from the receipt of the written information to respond to the complaint, and the employee bringing the complaint must wait until the end of that period before contacting the next person.

## e. Whistleblower

### ANTI-FRAUD POLICY

#### OVERVIEW

Fraud is defined as any unsafe, dishonest, or illegal act or the intentional, false representation or concealment of a material fact for the purpose of misleading another to act upon it to cause harm to DC Prep or its employees, agents, Board of Directors, officers, students, families, suppliers, or visitors.

As stewards of the financial and other resources of DC Prep, each employee has the responsibility for preventing fraud and safeguarding those assets.

#### FRAUD PREVENTION

The prevention of fraud requires each employee to be alert and vigilant in the performance of the employee's job responsibilities. Each employee is expected at a minimum to:

1. Act with honesty, integrity and the promotion of ethical behavior.
2. Become familiar with DC Prep's system of internal controls and policies in place to ensure the safeguarding of assets.
3. Identify assets for which the employee has responsibility including budgets, intellectual property, office supplies, computers, petty cash, amounts collected as revenue, inventoried items, etc.
4. Establish a positive control environment by ensuring that all employees are aware of that employee's attention to potentially fraudulent activities.
5. Not use DC Prep's funds or assets for any personal or unlawful purpose.

6. Not use DC Prep's identification, stationery, supplies, equipment, etc. for personal or political matters.
7. Use good judgment when expending DC Prep's funds to ensure value received for each expenditure.
8. Not engage in false advertising, deceptive marketing practices or other misleading representations.

## FRAUD DETECTION

To detect fraud, each employee must be aware of actions constituting fraud, which may include, but are not limited to:

- Forgery or alteration of any document or account belonging to DC Prep
- Dishonest reporting of DC Prep activities
- Forgery or alteration of a check, bank draft, or any other financial document
- Fraudulent financial reporting, billing for services not performed or for goods not delivered
- Using DC Prep's name or resources for personal gain
- Disclosing confidential and proprietary information to outside parties
- Accepting or seeking anything of material value (i.e., collectively in excess of \$100) from contractors, vendors, or persons providing services/materials to DC Prep
- Destruction, removal or inappropriate use of records, furniture, fixtures, and equipment without the appropriate permission of DC Prep
- Any similar or related inappropriate or dishonest conduct.

If there is any question as to whether an action constitutes fraud, employees should promptly contact either the CFO or the CEO.

## FRAUD REPORTING

In the event of an alleged incident of fraud, each employee is responsible for immediately bringing the information to any one of the following confidential resources:

1. The employee's immediate supervisor;
2. The CFO or CEO; or
3. The Chair, Secretary, or Treasurer of DC Prep's Board of Directors.

Employees must exercise caution and sound judgment in reporting suspicions of fraud in good faith. A good faith complaint is one in which the employee reasonably believes that an act of fraud has occurred. Employees may not intentionally file a false report of wrongdoing. In addition, employees who are aware of fraud shall promptly report it as described above.

An employee should not discuss the case, facts, suspicions, or allegations with anyone, including the individual suspected of fraud, unless specifically asked to do so by the CEO, CFO, or a

member of the Board of Directors. An employee should not investigate the activity or determine fault or corrective measures.

The party receiving the information will treat such information with discretion, but may share it with the CEO, the CFO, the Chair, the Secretary, or the Treasurer to ensure prompt action. DC Prep will then take the actions it deems appropriate to resolve the situation.

The authorized employees of DC Prep performing the investigation shall have full access to:

- All company records and premises.
- All or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who may use any such items or facilities.

When appropriate, in addition to any disciplinary actions that DC Prep may take in accordance with the Disciplinary Action section of this Employee Manual, violators of this policy may be referred to the appropriate police and legal authorities for prosecution and restitution may be required.

## CONTACTS

Questions related to the interpretation of this fraud policy should be directed to the CEO, CFO, or the Chair of the Board of DC Prep.