

## **Anti-Harassment Policy Statement**

It is DCI's intent to maintain a workplace free from harassment or intimidation of any employee by co-workers, management personnel, vendors, or others. Harassment because of an individual's race, color, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, gender identity or expression, family responsibilities, genetic information, disability, matriculation, political affiliation, or any other status protected under applicable federal, state or local laws will not be tolerated.

Sexual harassment is illegal and is defined as unwelcome sexual advances, requests for sexual favors, or any visual, verbal or physical conduct of a sexual nature when, for example: (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (ii) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (iii) 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.

Sexual harassment may include a range of subtle and not so subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include, but are not limited to: unwanted sexual advances or requests for sexual favors, sexual jokes or innuendos, verbal abuse of a sexual nature, commentary about an individual's body, pranks, catcalls, leering, insulting or obscene comments or gestures, display or circulation of cartoons or pictures that may be considered to be derogatory or offensive, and any other physical, verbal or visual conduct of a sexual nature.

Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, national origin, age, sexual orientation, marital status, disability, or any other characteristic protected by the law. Harassing conduct includes, but is not limited to: epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes and display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group.

This policy applies to all applicants and employees. Employees found in violation of this policy will be subject to disciplinary action up to and including immediate dismissal and may be found personally liable in any legal action brought against them.

DCI strongly urges the reporting of all incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Any employee who believes he or she has witnessed or been subjected to harassment or intimidation in the workplace may notify the Business Director, School Leadership, or the Executive Director immediately, or in the alternative, the Chair of the Board of Trustees.

DCI will endeavor to investigate all complaints as expeditiously, thoroughly, and impartially as possible.

The person lodging the complaint will be advised of the results of any investigation, and the appropriate corrective action will be taken against the harasser when investigation confirms the allegations. If after investigating any complaint of harassment or unlawful discrimination DCI learns that an employee has purposely provided false information regarding the complaint, disciplinary action up to and including dismissal may be taken against the individual who provided the false information.

There will be no retaliation against employees for reporting harassment or assisting DCI in the investigation of a complaint. Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action. An employee who believes he or she experienced or witnessed any incidents of retaliation prohibited by this policy may notify the Business Director, School Leadership, or the Executive Director immediately, or in the alternative, the Chair of the Board of Trustees.

## **Equal Employment Opportunity Policy Statement**

DCI International School has and shall continue to have a policy that all persons are entitled to equal employment opportunity based upon personal capabilities and qualifications, regardless of race, color, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, gender identity or expression, family responsibilities, genetic information, disability, matriculation, political affiliation, or any other status protected under applicable federal, state or local laws. DCI will not discriminate against any qualified applicants or employees with respect to any terms or conditions of employment based on their membership in any protected class. DCI also prohibits discrimination and harassment based on a perception that anyone is in one of these protected categories, or is associated with a person who is or is perceived as being in any one of these protected categories.

This Equal Employment Opportunity Policy applies to all policies and procedures relating to recruitment and hiring, promotion, compensation, benefits, termination and all other terms and conditions of employment.

DCI does not and will not permit employees to engage in unlawful discrimination or harassment practices. It is the responsibility of all employees to ensure that the concepts of equal employment opportunity, non-harassment and non-discrimination are understood, abided by and carried out by everyone. An employee who experiences or witnesses any conduct that is inconsistent with this policy should report such incidents to the Business Director or School Leadership. Anyone who receives such a report shall report such incidents to the Executive Director. A prompt investigation of all complaints will be conducted.

There will be no retaliation against employees for reporting discrimination or assisting DCI in the investigation of a complaint. Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action. An employee who believes he or she experienced or witnessed any incidents of retaliation prohibited by this policy may notify the Business Director, School Leadership, or the Executive Director immediately, or in the alternative, the Chair of the Board of Trustees.

## **Alcohol and Drug Policy**

DCI is committed to protecting the safety, health and well-being of all employees and individuals in our workplace. We recognize that alcohol abuse and drug use pose a significant threat to our goals. We have established a drug free workplace program that balances our respect for individuals with the need to maintain an alcohol- and drug-free environment.

It is the policy of DCI to maintain age-appropriate, developmental drug and alcohol education and prevention programs. The program shall convey to students that the use of illicit drugs and the unlawful possession of alcohol are harmful and wrong.

The standards of conduct in the school clearly prohibit, at a minimum, the unlawful possession, manufacture, distribution, dispensing, possession or use of a controlled substance. No student or staff member shall use, possess, sell, trade, and/or offer for sale alcohol, illegal drugs or intoxicants.

Entering the organization's property constitutes consent to searches and inspections. If an individual is suspected of violating the drug-free workplace policy, he or she may be asked to submit to a search or inspection at any time.

Discipline for violating the standards of conduct set out above will be governed by the school's policies and rules. Consistent with federal, state and local law, the school will impose sanctions on students and staff members who violate the standards of conduct, up to and including for students, expulsion and referral for prosecution, and for staff, up to and including immediate dismissal.

Any employee who is convicted for a violation of a criminal drug statute occurring in or outside the workplace must notify the Business Director no more than five calendar days after the conviction.

## **Grievance Policy**

It is the policy of DC International School that all employees, students, parents, and visitors, have the right to voice their complaints or grievances about matters pertaining to its schools. DCI recognizes the meaningful value and importance of full discussion in resolving misunderstandings and in preserving good relations between management and employees and between the School, its students and their families. Accordingly, the following grievance procedure should be employed to ensure that complaints receive full consideration.

### *What May Be Grieved*

DCI's grievance process should be used as follows: (1) to deal with complaints and concerns pertaining to educational environment, employment arrangements, or interpersonal conflicts; and (2) to resolve complaints of discrimination and harassment based upon race, color, religion, creed, sex, national origin, age, disability, veteran status, sexual orientation, or other protected status.

### *Who May Grieve*

The procedures set forth below may be used by grievants, who can be employees, students, parents, or visitors.

### *Other Remedies*

The existence of this procedure does not bar grievants from also filing claims in other forums to the extent permitted by state or federal law. The filing of a grievance under this procedure does not toll or extend the time periods set by federal, state or local law to file external complaints or charges.

### *Informal Grievance*

Because most difficulties can be resolved by communicating a concern to someone, grievants, are encouraged to discuss their concern or harassment complaint promptly and candidly with their immediate supervisor, the Business Director or School Administration. The grievant is not required to discuss his or her complaint with any alleged harasser or perpetrator in any manner or for any reason prior to initiating a formal grievance.

### *Formal Grievance*

Within ninety (90) days of encountering the harassment, discrimination, or incident that is the subject of the grievance, a grievant shall file a written notice with the School Administration. The written notice shall identify the nature of the complaint, the date(s) of occurrence, and the desired result, and shall be signed and dated by the person filing the grievance. In the event of a grievance being filed on behalf of a student by the legal guardian or parent of the aggrieved student, both the student and the legal guardian and/or parent shall sign and date the grievance.

School Administration will immediately initiate an adequate, reliable impartial investigation of the grievance. Each formal complaint will be investigated, and depending on the facts involved in each situation, will be decided after receiving information from the

appropriate sources. Each investigation may include interviewing witnesses, obtaining documents, and allowing parties to present evidence.

All documentation related to the investigation and discussions held in this process are considered EXTREMELY CONFIDENTIAL and are not to be revealed to or discussed by any participant with persons not directly involved with the complaint, its investigation or with the decision-making process. This provision does not include discussions with the governmental authorities.

Within thirty (30) business days of receiving the written notice, the School Administration shall respond in writing to the grievant (the "Response"). The Response shall summarize the course of the investigation, the relevant factual findings and the appropriate resolution. If, as a result of the investigation, harassment, or a valid grievance is established, appropriate corrective and remedial action will be taken.

#### *Appeals*

If the grievant is not satisfied with the Response, the grievant may appeal in writing to the DC International School Board of Trustees (or designee) within thirty (30) days of the date of the Response summarizing the outcome of the investigation. The written appeal must contain all written documentation from the initial grievance and the grievant's reasons for not accepting the Response. The appeal, in letter form, may be sent to the Chair of the Board of Trustees. Within fifteen (15) days from receiving the written appeal, the Board of Trustees will respond in writing to the appellant as to the action to be taken and the reasons therefor.

#### *Prohibition Against Retaliation*

DCI pledges that it will not retaliate against any person who files a grievance in accordance with this policy, or any person who participates in proceedings related to this policy. In addition, DCI will not tolerate any form of retaliation against any person who makes a good faith report or complaint about perceived acts of harassment, discrimination, or concern, or who cooperates in an investigation of harassment, discrimination, or a concern. Any person who is found to be engaging in any kind of retaliation will be subject to appropriate disciplinary action.

#### *Modification*

DC International School may approve modification of the foregoing procedures in a particular case if the modification (a) is for the good cause, and (b) does not violate due process rights or policies of DC International School.

## ANTI-FRAUD AND WHISTLEBLOWER POLICY

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 International School (DCI) or to Employees of DCI.

As stewards of the financial and other resources of DCI, each employee has the responsibility for preventing fraud and safeguarding those assets. It is the policy of DCI that each employee is responsible for the prevention, detection, and reporting of fraudulent or potentially fraudulent activities. Whistleblower protections are in place to maintain the confidentiality of the reporting employee and to guard against retaliation.

### Fraud Prevention

The prevention of fraud requires each employee to be alert and vigilant in the performance of his or her job responsibilities. Each employee is expected to:

- Act with honesty, integrity and the promotion of ethical behavior.
- Believe that fraud is possible and that you can identify it.
- Become familiar with DCI's system of internal controls and the policies in place to ensure the safeguarding of assets and to understand your role, such as:
  - Signature authority limits, which relate to Requests for Proposals, contracts, purchase orders, invoices, expense reports, and any documents that obligate DCI's resources – both financial and human
  - Technology and Equipment Use Policy
  - Copyrights, Royalties, Patents Policy
  - Transportation Expenses and Travel Expenses Policy
  - Consulting Policy
  - Other policies in the Employee Handbook
- Identify assets for which you have responsibility including budgets, intellectual property, office supplies, computers, petty cash, amounts collected as revenue, inventoried items etc.
- Ask yourself questions, with regard to the following:
  - If these assets were to be misused or misappropriated, how would I know?
  - What controls exist to prevent or detect inappropriate use or loss?
  - What additional controls are necessary to safeguard these assets?
- Ensure adherence to the background check (i.e. criminal, financial, and professional) and other hiring policies and procedures of DCI and support the school's efforts to hire honest employees.

- Establish a positive control environment by ensuring that all employees are aware of your attention to potentially fraudulent activities and aware of their responsibilities to prevent fraud.
- Ensure that the following actions are taken:
  - Maintain a positive work environment, Report and account for all revenues generated and all expenditures incurred in the financial accounting system of DCI.
  - Make no false or artificial entries in the accounting records for any reason.
  - Make no payments in the name of DCI for any purpose other than that described by the documents supporting the payment.
  - Do not use DCI funds or assets for unlawful purpose.
  - Use good judgment when expending DCI funds for reimbursable travel costs, etc. to ensure value received for each expenditure.
  - Do not engage in false advertising, deceptive marketing practices or other misleading representations.
  - Do not establish any bank or investment accounts in the name of DCI without express permission from the Executor Director.
  - Record all transactions for accurate financial statement preparation.

### 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 DCI
- Dishonest reporting, on timesheets, of DCI activities
- Forgery or alteration of a check, bank draft, or any other financial document
- Misappropriation of funds, securities, supplies or other assets for non-program use or for personal use
- Impropriety in the handling or reporting of money or financial transactions, including the handling of customer credit card information, check copies, etc.
- Fraudulent financial reporting, billing for services not performed or for goods not delivered
- Participation in private inurnment (using DCI's name or resources for personal gain)
- Disclosing confidential and proprietary information to outside parties, Accepting or seeking anything of material value (i.e. in excess of \$100) from contractors, vendors, or persons providing services/materials to DCI
- Destruction, removal or inappropriate use of records, furniture, fixtures, and equipment without the appropriate permission
- Any similar or related inappropriate or dishonest conduct

If there is any question as to whether an action constitutes fraud, contact either the Executive Director or the Chair of the board.

### Honorariums:

DCI staff may accept honorariums for services provided external to DCI sanctioned activities. It is expected that all time spent on such activities shall not be charged to DCI, or DCI projects.

### Fraud Reporting:

In the event of an alleged incident of fraud, each employee is responsible for acting as a whistleblower by immediately bringing the information to the following confidential resources:

1. his/her immediate supervisor or
2. Executive Director or
3. the Chair or the Secretary or Treasurer of the Board.

Employees must exercise caution and sound judgment to avoid baseless allegations, which are those made with reckless disregard for their truth or falsity. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination. In addition, Employees who are aware of fraud and fail to report it may face personal action up to and including dismissal.

The whistleblower should NOT contact the suspected individual in an effort to determine facts or demand restitution. The whistleblower should NOT discuss the case, facts, suspicions, or allegations with anyone, unless specifically asked to do so by the Executive Director. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

1. The party receiving the information will treat it as confidential, but will share it with the Executive Director, the Chair of the Board, or the Secretary or Treasurer of the Board to ensure prompt action. The following actions may then be taken by DCI's management as the situation warrants: Notification to the Board Chair, Treasurer and Finance Committee
2. Investigation by the Executive Director, the Board Chair, and the Secretary and Treasurer of the Board

Based upon the results of the investigation, the DCI may:

1. Contact legal counsel.
2. Undertake appropriate personnel action which may include restitution, suspension, or termination.
3. Implement/Enhance relevant control systems.
4. Conduct training of DCI staff as appropriate.

The member of DCI's management 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 spaces without prior knowledge or consent of any individual who may use any such items or facilities

Dishonest actions will not be tolerated and violators may be discharged and/or referred to the appropriate authorities. Restitution may be required. This policy will be applied, as appropriate, to all Employees regardless of position/title, length of service, or relationship to DCI.

### Whistleblowers Protections

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, an Employee's identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense.

DCI will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as harassment, termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must file a written complaint with the Executive Director, the Board Chair, the Board Secretary or the Board Treasurer immediately. A proven complaint of retaliation shall result in a proper remedy for the person harmed and the initiation of disciplinary action, up to and including dismissal, against the retaliating person. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

### Contacts

Questions related to the interpretation of this policy should be directed to the Executive Director or the Board Chair.