

EQUAL EMPLOYMENT OPPORTUNITY AND PROHIBITIONS ON DISCRIMINATION AND HARASSMENT

POLICY ON WORKPLACE ACCOMMODATIONS

ACCOMMODATIONS FOR INDIVIDUALS WITH DISABILITIES

KIPP DC is committed to ensuring an equal opportunity in employment for qualified individuals with disabilities. KIPP DC complies with the Americans with Disabilities Act (ADA) and Americans with Disabilities Act Amendments Act (ADAAA) and other applicable federal, DC, state and local laws. This means we do not discriminate against any qualified employee or applicant because of their disability or because the person is related to or associated with a person with a disability. This also means KIPP DC provides qualified individuals with disabilities with reasonable accommodations, unless doing so would present an undue hardship or direct threat to the safety of the employee or others in the workplace. A reasonable accommodation is any change or adjustment to the workplace that permits a qualified applicant or employee with a disability to participate in the job application process, to perform the essential functions of a job, or to enjoy benefits and privileges of employment equal to those enjoyed by employees without disabilities.

ACCOMMODATIONS FOR RELIGIOUS BELIEFS

KIPP DC is committed to providing reasonable accommodations for an employee's bona fide religious beliefs, unless doing so would cause more than a minimal burden on school operations. Accommodations might include time off or a modification to an employee's schedule during a religious holiday.

ACCOMMODATIONS FOR PREGNANT WORKERS

Consistent with the Protecting Pregnant Workers Fairness Act of 2014 and other applicable federal, DC, state and local laws, KIPP DC provides reasonable accommodations to employees whose ability to perform job duties is limited because of pregnancy, childbirth, breastfeeding, or a related medical condition.

ACCOMMODATIONS FOR NURSING MOTHERS

Employees at KIPP DC are entitled to a reasonable amount of break time to accommodate an employee's need to express breast milk for the employee's infant child, for up to one year after the birth of the employee's child. The break time should, if possible, be taken concurrently with other break periods already provided. KIPP DC will also make a reasonable effort to provide nursing employees with

the use of a room or other location in close proximity to the team member's work area (other than a bathroom or toilet stall) to express breast milk.

REQUESTING AN ACCOMMODATION

In general, it is an employee's responsibility to notify KIPP DC of the need for an accommodation. To request an accommodation, contact the Human Resources representative for your work location or email Human Resources at HR@kipfdc.org. To the extent the accommodation is for medical reasons, you and your health care provider may be asked for information regarding your condition as part of KIPP DC's review of your accommodation request. Employees are expected to cooperate in this information-gathering process in a timely manner and failure to do so could adversely affect KIPP DC's ability to provide an accommodation. Any medical information shared with a KIPP DC representative as part of the accommodations request process will be kept confidential to the full extent permitted by law.

POLICY PROHIBITING DISCRIMINATION

KIPP DC is committed to providing employees with a work environment that is safe, welcoming, and inclusive. This includes ensuring that the work environment is free from unlawful discrimination. As an equal opportunity employer, KIPP DC complies with all applicable federal, DC, state, and local anti-discrimination laws, including Title VII of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Title II of the Americans with Disabilities Act of 1990 and the D.C. Human Rights Act of 1977.

KIPP DC does not discriminate against, or tolerate discrimination against, employees or applicants for employment on any legally-recognized basis or protected class including, but not limited to, actual or perceived race, color, national origin, immigration status (except as necessary to comply with federal, DC, state, or local law), religion, sex (including pregnancy, childbirth, lactation and related medical conditions), age, physical or mental disability, medical condition, sexual orientation, gender (including gender identity or expression), marital status (including domestic partnership status), genetic information, political affiliation, pregnancy, family responsibilities, personal appearance, veteran status, uniform service member status, status of being unemployed, status of victim a survivor of domestic violence, sexual offense or stalking, matriculation or any other protected class under federal, state, DC, or local law. This policy governs all aspects of employment at KIPP DC, including recruitment, hiring, placement, training, promotion, transfer, demotion, compensation, benefits, discipline, termination, and all other terms and conditions of employment.

Individuals who violate this policy shall be subject to disciplinary action.

If you experience or witness conduct that you believe to be prohibited by this policy, please contact your School Leader, Supervisor, Human Resources, or any other manager with whom you feel comfortable to report your concerns, as described in the Complaint Procedure and Open Door Policy set forth below.

POLICY PROHIBITING HARASSMENT

KIPP DC is committed to providing employees with a safe, welcoming, and inclusive work environment. This includes ensuring that the work environment is free from impermissible harassment. As an equal opportunity employer, KIPP DC complies with all applicable federal, DC, state, and local anti-harassment laws. KIPP DC prohibits harassment on the basis of race, color, national origin, religion, sex, age, physical or mental disability, sexual orientation, gender identity or expression, marital status, genetic information, political affiliation, pregnancy, family responsibilities, personal appearance, veteran status, uniform service member status, matriculation, credit information, or any other protected class under federal, DC, state, or local law.

Prohibited harassment is verbal or physical conduct that denigrates or shows hostility to an individual based on one of the protected categories specified above. However, an individual need not be the target of the harassment (or a part of the group that is being targeted by the harassing conduct) to be offended or injured by the harassing behavior.

Prohibited harassment may include, but is not limited to, epithets, slurs, derogatory comments or jokes, intimidation, negative stereotyping, threats, assault or any physical interference with the employee's normal work or movement. Harassment may also include written or graphic material placed on walls, bulletin boards or elsewhere on KIPP DC's premises or circulated in the workplace that denigrates, and/or shows hostility or aversion towards an individual or group because of the characteristics identified above. The conduct prohibited by this policy includes conduct in any form including but not limited to e-mail, voicemail, social media, Internet use or history, text messages, pictures, images, writings, words or gestures.

Individuals who violate this policy shall be subject to disciplinary action.

If you experience or witness conduct that you believe to be prohibited by this policy, please contact your School Leader, Supervisor, Human Resources, or any other manager with whom you feel comfortable to report your concerns, as described in the Complaint Procedure and Open Door Policy set forth below.

POLICY PROHIBITING SEXUAL HARASSMENT AND UNWELCOME SEXUAL CONDUCT

KIPP DC is committed to providing a workplace free of sexual harassment and other unwelcome sexual conduct. KIPP DC prohibits unwelcome sexual conduct that creates an offensive or hostile working environment or unwelcome sexual conduct that is, either explicitly or implicitly, made a condition of

receiving an employment benefit or avoiding an employment detriment at KIPP DC. Sexual harassment may occur between people of the same sex or gender identities or between people who have different sex or gender identities.

Examples of prohibited unwelcome sexual conduct include, but are not limited to:

- Verbal harassment (e.g., sexual requests, comments, jokes, slurs);
- Physical harassment (e.g., physical contact); and
- Visual harassment (e.g., posters, cartoons, e-mails or drawings of a sexual nature).

Our workplace is not limited to KIPP DC's facilities, but includes anywhere a business/school-related function is taking place, including all KIPP DC sponsored events. In addition, unwelcome sexual conduct between KIPP DC staff that occurs outside the workplace may be prohibited by this policy if it interferes with or limits an employee's ability to participate in or benefit from the employment program. Sexual harassment and any unwelcome sexual conduct of any kind may result in disciplinary action, up to and including termination of employment, regardless of whether it is unlawful.

If you experience or witness conduct that you believe to be prohibited by this policy, please contact your School Leader, Supervisor, Human Resources, or any other manager with whom you feel comfortable to report your concerns, as described in the Complaint Procedure and Open Door Policy set forth below.

POLICY PROHIBITING SEXUAL ABUSE

KIPP DC prohibits and does not tolerate sexual abuse in the workplace or in any KIPP DC related activity. Sexual abuse includes sexual molestation, sexual assault, sexual exploitation, or sexual injury. As explained below, KIPP DC provides procedures for employees, volunteers, family members, board members, students, or others to report sexual abuse and disciplinary penalties for those who commit such acts. No employee, volunteer, student or third party, no matter his or her title or position has the authority to commit or allow sexual abuse. Any incidents of sexual abuse reasonably believed to have occurred will be reportable to appropriate law enforcement agencies and regulatory agencies.

KIPP DC has a zero-tolerance policy for any sexual abuse committed by an employee, volunteer, board member or third party.

If you experience or witness conduct that you believe to be prohibited by this policy, please contact your School Leader, Supervisor, Human Resources, or any other manager with whom you feel comfortable to report your concerns, as described in the Complaint Procedure and Open Door Policy set forth below.

COMPLAINT PROCEDURE AND OPEN DOOR POLICY

KIPP DC has an open door policy. If an employee believes that they have been subjected to unwelcome conduct, prohibited harassment, discrimination, or retaliation by any KIPP DC employee, vendor, parent, student, or family, the employee should immediately report the incident to Human Resources, their School Leader, Supervisor, KIPP DC's Title IX Coordinator², or any manager with whom the employee feels comfortable. The employee may also make a report to the Chief Executive Officer, President, or General Counsel. Reporting may be done in person, in writing, or by telephone.

During the complaint process, KIPP DC will protect to as great a degree as is legally possible the confidentiality of the information received, the privacy of the individuals involved, and the wishes of the complaining person. KIPP DC will not retaliate, nor will it tolerate retaliation, against employees who complain in good faith about harassment, discrimination, or retaliation in the workplace. If KIPP DC receives an allegation of harassment, discrimination, or retaliation, or has reason to believe harassment, discrimination, or retaliation is occurring, we will take the necessary steps to ensure that the matter is promptly investigated and addressed. If the allegation is determined to be credible, KIPP DC will take immediate and effective measures to end the unwelcome and/or unlawful behavior.

KIPP DC Supervisors and School Administrators who observe, are informed of, or reasonably suspect incidents of possible harassment, discrimination or retaliation must immediately report such incidents to Human Resources, which will either initiate or oversee a prompt investigation. Failure to report such incidents to Human Resources will be considered a violation of this policy and may result in disciplinary action, up to and including termination.

Appropriate disciplinary action will be taken against any employee who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension, or termination of employment. Supervisors and School Administrators should take effective measures to ensure no further harassment, discrimination, or retaliation occurs pending completion of an investigation.

KIPP DC employees are welcome and encouraged to share ideas, suggestions, and complaints with their School Leader, Supervisor, Human Resources, General Counsel, the Chief Executive Officer, or the President. We hope this open door policy promotes a sense of open communication, camaraderie, and continues to foster a team environment.

² KIPP DC's Title IX Coordinator, Shaundricka Ranel, may be reached as follows:

Phone: 202-750-5903; Email: Shaundricka.Ranel@kipfdc.org; Mail: 2600 Virginia Avenue NW, Suite 900 Washington, DC 20037.

As explained below, KIPP DC's Whistleblower Policy prohibits retaliation against any employee, volunteer, board member or student who reports a good faith complaint, or who participates in any related investigation.

WHISTLEBLOWER POLICY AND PROCEDURES

GENERAL

KIPP DC is committed to lawful and ethical behavior in all of its activities and requires the board, advisors, employees and volunteers to act in accordance with all applicable laws, regulations and policies and observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

The objectives of KIPP DC's whistleblower policy are to establish policies and procedures to:

- Prevent or detect and correct wrongdoing, including violation of public policies expressed in statutes, regulations, or constitutional provisions;
- Encourage each director, officer, employee and volunteer ("Individual") to report what they in good faith believe to be a material violation of law or policy or questionable accounting or auditing matter by KIPP DC;
- Ensure the receipt, documentation, retention of records, and resolution of reports received under this policy; and
- Protect Individuals from retaliatory action.

REPORTING RESPONSIBILITY

Each Individual has an obligation to report what they believe is a material violation of law or policy or any questionable accounting or auditing matter by KIPP DC, its directors, officers, advisors, employees, volunteers, or other representatives. The types of concerns that should be reported include, for purposes of illustration and without being limited to, the following:

- Providing false or misleading information on KIPP DC's financial documents, grant reports, tax returns or other public documents;
- Providing false information to or withholding material information from KIPP DC's auditors, accountants, lawyers, directors or other representatives responsible for ensuring KIPP DC compliance with fiscal and legal responsibilities;
- Embezzlement, private benefit, or misappropriation of funds;
- Material violation of KIPP DC policy, including among others, confidentiality, conflict of interest, whistleblower, ethics and document retention;
- Discrimination based on any protected class;

This Employee Handbook does not constitute a contract or agreement of employment nor guarantee any fixed terms and conditions of employment, either express or implied. KIPP DC reserves the right to alter, eliminate, or otherwise change any policy, without notice, at any time, except the at-will employment policy which may only be changed by written agreement signed by an employee and the Chief Executive Officer, President or their designees.

- Sexual harassment or abuse;
- Retaliation against an employee who has engaged in protected activity;
- Facilitating or concealing any of the above or similar actions.

REPORTING CONCERNS

Employees

Whenever possible, an employee should seek to resolve concerns by reporting issues directly to their Supervisor or to the next level of management as needed until matters are satisfactorily resolved. However, if, for any reason, an employee is not comfortable speaking to a Supervisor or does not believe the issue is being properly addressed, the employee may contact Human Resources, the Chief Executive Officer, or General Counsel. If an employee does not believe that these channels of communication can or should be used to express their concerns, an employee may contact the chair of the Finance Committee. The Finance Committee is made up of the Director of Finance, the President of KIPP DC, and a minimum of three members of the Board of Trustees. Whenever practical, reports should be in writing.

Board Members, Advisors and Other Volunteers

Board members, advisors, and other volunteers may submit concerns to the Chief Executive Officer. If the volunteer, advisor, or board member is not comfortable reporting to the Chief Executive Officer or if they do not believe the issue is being properly addressed, they may report directly to the chair of the Board.

HANDLING OF REPORTED VIOLATIONS

KIPP DC will promptly investigate all reports filed in accordance with this policy with due care. Matters reported internally without initial resolution will be investigated to determine if the allegations are true, whether the issue is material and what actions, if any, are necessary to correct the problem. KIPP DC staff will issue a full report of all matters raised under this policy to the Finance Committee. The Finance Committee may conduct a further investigation upon receiving the report from the Chief Executive Officer.

For matters reported directly to the Finance Committee or the chair of the Board, the Finance Committee shall promptly acknowledge receipt of the complaint to the complainant if the identity of the complainant is known and conduct an investigation to determine if the allegations are true and whether the issue is material and what, if any, corrective action is necessary. Upon the conclusion of this investigation, the Finance Committee shall promptly report its findings to the KIPP DC Board of Directors.

Authority of Finance Committee

The Finance Committee shall have full authority to investigate concerns raised in accordance with this policy and may retain outside legal counsel, accountants, or any other resource that the Committee reasonably believes is necessary to conduct a full and complete investigation of the allegations.

No Retaliation

This Whistleblower Policy is intended to encourage and enable board members, advisors, employees and volunteers to raise serious concerns within the organization for investigation and appropriate action. With this goal in mind, no director, advisor, employee or volunteer who, in good faith, reports a concern shall be threatened, discriminated against or otherwise subject to retaliation or, in the case of an employee, adverse action as a result of such report. Moreover, a volunteer or employee who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

Acting in Good Faith

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the matter raised is a violation of law or policy or of accounting or auditing procedures. The act of making allegations that prove to be unsubstantiated and that prove to have been made maliciously, recklessly, with gross negligence, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Depending on the circumstances, such conduct may also give rise to other actions, including civil or criminal lawsuits.

CONFIDENTIALITY

KIPP DC will treat all communications under this policy as confidentially as possible, but may need to disclose information for business reasons, including: 1) to conduct a complete and fair investigation, or 2) for review of KIPP DC's operations by KIPP DC's board, Finance Committee, independent public accountants, and/or legal counsel.

SAFETY AT KIPP DC

KIPP DC has a fundamental interest and commitment in maintaining a safe and efficient working environment. If any KIPP DC employee observes a safety issue at a KIPP DC school or headquarters location, please contact a School Leader, the Human Resources Department, or the Chief Executive Officer.

ALCOHOL, DRUG AND TOBACCO FREE WORKPLACE

Employees who work while under the influence of drugs or alcohol present a safety hazard to themselves and their co-workers. Moreover, the presence of drugs, alcohol and tobacco in the workplace limits our ability to perform at the highest levels and provide the best possible service. Accordingly, KIPP DC is committed to maintaining a drug, alcohol and tobacco free environment.

The following conduct is prohibited on KIPP DC's property, including but not limited to school buildings, grounds, parking lots, garages and fields, along with off-site activities with staff or students, and may result in disciplinary actions up to and including termination:

- Possession, transfer, sale, distribution, use or solicitation of illegal drugs on KIPP DC property (including the parking lot and adjacent areas) or during working hours.
- Possession or consumption of alcohol on KIPP DC property (including adjacent areas) or during working hours. This does not include the authorized use of alcohol at KIPP DC sponsored functions or activities.
- Possession or use of tobacco products on KIPP DC property (including the parking lot and adjacent areas) or during working hours.
- Reporting to work or being present at work while being intoxicated or impaired by alcohol or drugs. This does not include the authorized use of alcohol at KIPP DC sponsored functions or activities.
- Reporting to work, or being present at work, with a detectable amount of any illegal drug or its metabolites in the employee's body.
- Abuse of prescribed drugs. Prescribed drugs will be allowed only when taken in accordance with a physician's prescription, and where such use will not adversely affect the ability of an individual to properly and safely perform his or her duties. Any employee who is taking prescription drugs that may affect the employee's ability to perform the job properly and safely should inform their School Leader or Supervisor before or immediately upon reporting to work. Abuse of prescribed drugs will not be tolerated and will be treated in the same fashion as use of illegal drugs.

Consistent with its fair employment policy, KIPP DC maintains a policy of non-discrimination and reasonable accommodation with respect to persons recovering from substance use disorders, and those having a medical history reflecting treatment for substance abuse conditions. Employees are encouraged to seek assistance before their drug and alcohol use renders them unable to perform their essential job functions or jeopardizes the health and safety of themselves or others. KIPP DC will attempt to assist its employees through referrals to rehabilitation, appropriate leaves of absence and other measures, consistent with KIPP DC's policies and applicable federal, DC, state or local laws. Employees who are struggling with alcohol or drug use concerns are encouraged to contact our free and confidential Employee Assistance Program, which is discussed above in the Benefits section.

KIPP DC further reserves the right to take any and all appropriate and lawful actions necessary to enforce this alcohol, drug and tobacco free workplace policy including, but not limited to, the inspection of KIPP DC issued lockers, desks or other suspected areas of concealment, as well as an employee's personal property when KIPP DC has reasonable suspicion to believe that the employee has violated this drug, alcohol and tobacco free workplace policy. Furthermore, if there is any reasonable suspicion that an employee has taken illegal drugs, or is on illegal drugs, while on KIPP DC's property, KIPP DC reserves the right to conduct a drug test.

Violation of this policy may result in disciplinary action, up to and including termination.

STAFF VISITORS

To ensure a safe, happy and healthy environment for employees and students, all KIPP DC employees, interns and volunteers are required to check in with security when visiting a campus where they do not normally work.

CHILDREN OF EMPLOYEES AT WORK

As part of our mission to foster safe, healthy, and productive learning and working environments, staff members are not permitted to bring their minor children to work, with rare exceptions. Instead, staff members are expected to make arrangements for childcare during their normal working hours.

If an unforeseen emergency should arise and a staff member is unable to secure childcare for their minor child, the staff member should consult their supervisor about their options, including taking leave.

Employees and supervisors must consider how a child's presence in the workplace may affect that child's safety, the safety of students and staff, confidentiality, efficient operations, provision of services, the work of other employees, and legal liability. With these principles in mind, a supervisor should only grant a limited exception to this policy and permit an employee to bring their child to work in rare instances and if each of the following conditions is met:

This Employee Handbook does not constitute a contract or agreement of employment nor guarantee any fixed terms and conditions of employment, either express or implied. KIPP DC reserves the right to alter, eliminate, or otherwise change any policy, without notice, at any time, except the at-will employment policy which may only be changed by written agreement signed by an employee and the Chief Executive Officer, President or their designees.