

HARASSMENT POLICY

POLICY PROHIBITING HARASSMENT

Digital Pioneers Academy is committed to providing a work environment that is free of harassment. As an equal opportunity employer, Digital Pioneers Academy complies with all applicable federal and DC anti-harassment laws. Digital Pioneers Academy prohibits harassment based on (but not limited to) race, color, national origin, ancestry, sex (including pregnancy, childbirth, lactation, and related medical conditions) gender (including gender identity and expression), sexual orientation, religion, age, genetic information, physical or mental disability, political affiliation, marital status, familial responsibilities, personal appearance, source of income, veteran status, uniform service member status, immigration status (except as necessary to comply with federal, state, or local law), or any other protected class under applicable federal or DC law.

Prohibited harassment is verbal or physical conduct that denigrates or shows hostility to an individual based on one of the protective categories specified above. 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 Digital Pioneers Academy'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 email, voice mail, chat rooms, Internet use or history, text messages, pictures, images, writings, words or gestures.

POLICY PROHIBITING SEXUAL HARASSMENT AND UNWELCOME SEXUAL CONDUCT

Digital Pioneers Academy is committed to providing a workplace free of sexual harassment and other unwelcome sexual conduct. Digital Pioneers Academy prohibits unwelcome sexual conduct that creates an offensive or hostile working environment or unwelcome sexual conduct that is made a condition of working at Digital Pioneers Academy. Sexual harassment may occur between people of the same or opposite sex.

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 Digital Pioneers Academy's facilities but includes anywhere a business/school-related function is taking place, including all Digital Pioneers Academy sponsored events. 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.

POLICY PROHIBITING SEXUAL ABUSE

Digital Pioneers Academy prohibits and does not tolerate sexual abuse in the workplace or in any Digital Pioneers Academy related activity. Sexual abuse includes sexual molestation, sexual assault, sexual exploitation, or sexual injury. As explained below, Digital Pioneers Academy provides procedures for employees, volunteers, family members, board members, scholars, or others to report sexual abuse and disciplinary penalties for those who commit such acts. No employee, volunteer, scholar 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. Digital Pioneers Academy has a zero-tolerance policy for any sexual abuse committed by an employee, volunteer, board member or third party.

Staff Complaint Resolution Process

Digital Pioneers Academy has an open-door policy. If an employee believes that he or she has been subjected to unwelcome conduct, prohibited harassment, discrimination, or retaliation by

Any Digital Pioneers Academy employee, vendor, parent, scholar, or family, employee should immediately report the incident to Digital Pioneers Academy leadership. If either of these

individuals are involved in the reported conduct, or, for some reason the employee feels uncomfortable making a report to leadership. the employee should make a report to the Chair of the Board or General Counsel. Reporting may be done in person, in writing, or by telephone.

During the complaint process, Digital Pioneers Academy 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. Digital Pioneers Academy will not retaliate, nor will it tolerate retaliation, against employees who complain in good faith about harassment or discrimination in the workplace. If Digital Pioneers Academy receives an allegation of harassment or discrimination or has reason to believe harassment or discrimination 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, Digital Pioneers Academy will take immediate and effective measures to end the unwelcome and/or unlawful behavior.

Digital Pioneers Academy leadership who observe, are informed of, or reasonably suspect incidents of possible harassment or discrimination must immediately report such incidents to Digital Pioneers Academy leadership, which will either initiate or oversee a prompt investigation. Failure to report such incidents are 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. Digital Pioneers Academy leadership will take effective measures to ensure no further apparent or alleged harassment occurs pending completion of an investigation.

Digital Pioneers Academy employees are encouraged, and welcome, to share ideas, suggestions, and complaints with Digital Pioneers Academy leadership, members of the Digital Pioneers Academy Board, or the General Counsel. We hope this open-door policy promotes a sense of open communication, camaraderie, and fosters a team environment. Digital Pioneers Academy's Whistleblower Policy prohibits retaliation against any employee, volunteer, board member, or scholar who reports a good faith complaint, or who participates in any related

investigation.

WHISTLEBLOWER POLICY

Digital Pioneers Academy is committed to lawful and ethical behavior in all 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 Digital Pioneers Academy's whistleblower policy are to establish policies and procedures to:

- Prevent or detect and correct improper employer wrongdoing, including violation of public policies expressed in statutes, regulations, or constitution as provisions;
- Encourage each director, officer, employee and volunteer ("Individual") to report what he or she in good faith believes to be a material violation of law or policy or questionable accounting or auditing matter by Digital Pioneers Academy;
- 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 he or she believes is a material violation of law or policy or any questionable accounting or auditing matter by Digital Pioneers Academy, its directors, 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 Digital Pioneers Academy's financial documents, grant reports, tax returns or other public documents;
- Providing false information to or withholding material information from Digital Pioneers Academy's auditors, accountants, lawyers, directors or other representatives responsible for ensuring Digital Pioneers Academy compliance with fiscal and legal responsibilities;
- Embezzlement, private benefit, or misappropriation of funds;

- Material violation of Digital Pioneers Academy policy, including among others, confidentiality, conflict of interest, whistleblower, ethics and document retention; •
- Discrimination based on any protected class;
- Sexual harassment or abuse;
- Facilitating or concealing any of the above or similar actions

Reporting Concerns

Employees

Whenever possible, employees should seek to resolve concerns by reporting issues directly to Digital Pioneers Academy leadership until matters are satisfactorily resolved. However, if for any reason an employee is not comfortable speaking to leadership or does not believe the issue is being properly addressed, the employee may contact a member of the Digital Pioneers Academy Board or the General Counsel.

Board Members, Advisors and Other Volunteers

Board members, advisors, and other volunteers may submit concerns to Digital Pioneers Academy leadership. If the volunteer, advisor, or board member is not comfortable reporting to either of these individuals, or if he/she does not believe the issue is being properly addressed, he/she may report directly to the Chair of the Board.

Handling of Reported Violations

Digital Pioneers Academy 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. Digital Pioneers Academy leadership will issue a full report of all matters raised under this policy to the Board. The Board may conduct a further investigation upon receiving the report.

For matters reported directly to the Chair of the Board, the Board shall promptly acknowledge receipt of the complaint to the complainant, if the identity of the complainant is known, and

investigate 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 Board shall promptly report its findings.

The Board shall have full authority to investigate concerns raised in accordance with this policy and may retain outside legal counsel, accountants, or any other resources reasonably 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 board member, 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 employment consequences due to such a 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 serious violation of law or policy or a material accounting or auditing matter. 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.

ALCOHOL, DRUG, AND TOBACCO FREE WORKPLACE

Employees who work while under the influence of drugs and alcohol present a safety hazard to scholars, 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 outcomes. Accordingly, Digital Pioneers Academy will maintain a drug, alcohol, and tobacco free environment.

The following conduct is prohibited on Digital Pioneers Academy's property, including but not limited to school buildings, grounds, parking lots, fields, and off-site activity areas with staff, scholars, or parents.

- Possession, transfer, sale, distribution, use or solicitation of illegal drugs on Digital Pioneers Academy property (including the parking lot and adjacent areas) or during working hours.
- Possession (in unopened containers) or use of alcohol on Digital Pioneers Academy property (including adjacent areas) or during working hours, unless specifically authorized by the School Leader.
- Possession or use of tobacco products on Digital Pioneers Academy 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 Digital Pioneers Academy 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 the School Leader 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, Digital Pioneers Academy maintains a policy of non-discrimination and reasonable accommodation with respect to recovering addicts and alcoholics 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. Digital Pioneers Academy will attempt to assist employees through referrals to rehabilitation and/or appropriate leaves of absence and other measures, consistent with Digital Pioneers Academy's policies and applicable federal, state, or local laws. Digital Pioneers Academy 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 Digital Pioneers Academy issued lockers, desks, or other suspected areas of concealment, as well as an employee's personal property when Digital Pioneers Academy 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 Digital Pioneers Academy's property, Digital Pioneers Academy reserves the right to conduct a drug test. Violations may result in disciplinary actions up to and including termination.

EQUAL OPPORTUNITY EMPLOYER

Digital Pioneers Academy is committed to providing a work environment that is free of discrimination. As an equal opportunity employer, Digital Pioneers Academy complies with all applicable federal and DC anti-discrimination laws. Digital Pioneers Academy does not discriminate against employees or applicants for employment on any legally-recognized basis or protected class including, but not limited to, race, color, national origin, ancestry, sex (including pregnancy, childbirth, lactation, and related medical conditions) gender (including gender identity and expression), sexual orientation, religion, age, genetic information, physical or mental disability, political affiliation, marital status, familial responsibilities, pregnancy, personal appearance, source of income, veteran status, uniform service member status, immigration status (except as necessary to comply with federal, state, or local law), or any other protected class under applicable federal or DC law. This policy governs all aspects of employment at Digital Pioneers Academy, including recruitment, hiring, placement, training, promotion, transfer, demotion, compensation, benefits, discipline, termination, and all other terms and conditions of employment.

Americans with Disabilities Act

The federal Americans with Disabilities Act (ADA) prohibits discrimination against qualified individuals with disabilities in job application procedures, hiring, firing, advancement, compensation, fringe benefits, job training and other terms, conditions and privileges of employment. The ADA does not alter the School's right to hire the best-qualified applicant, but it does prohibit discrimination against a qualified applicant or employee because of his or her disability, or because of a perceived disability. As a matter of School policy, the School prohibits discrimination of any kind against people with disabilities.

Consistent with our nondiscrimination policy, Digital Pioneers Academy will attempt to provide reasonable accommodations to a qualified individual with a disability, unless doing so would pose an undue hardship. Similarly, Digital Pioneers Academy is committed to providing reasonable accommodations for an employee's bona fide religious beliefs, unless doing so would cause an undue hardship more than a minimal burden on school operations. In general, it is the

employee's responsibility to notify Digital Pioneers Academy leadership of the need for accommodation.

Disabled Defined

An applicant or employee is considered disabled if he/she/they (1) actually has a physical or mental impairment that substantially limits one or more major life activities, (2) has a record or history of such an impairment or (3) is regarded or perceived (correctly or incorrectly) as having such impairment.

A qualified employee or applicant with a disability is an individual who satisfies the skill, experience, education, and other job-related requirements of the position held or desired, and who, with or without reasonable accommodation, can perform the essential functions of that position

Reasonable Accommodation

A reasonable accommodation is any change in the work environment (or in the way things are usually done) to help a person with a disability apply for a job, perform the duties of a job, or enjoy the benefits and privileges of employment.

Qualified applicants or employees who are disabled should request reasonable accommodation from the School in order to allow them to perform a particular job. If you are disabled and you wish such reasonable accommodation, contact the Director of Operations. On receipt of your request, we will meet with you to discuss your disability. We may ask for information from your health care provider(s) regarding the nature of your disability and the nature of your limitations or take other steps necessary to help us determine viable options for reasonable accommodation. We will then work with you to determine whether your disability can be reasonably accommodated, and if it can be accommodated, we will explore alternatives with you and endeavor to implement a mutually agreeable accommodation.

Reasonable accommodation may take many forms, and it will vary from one employee to another. Please note that according to the ADA, the School does not have to provide the exact accommodation you want, and if more than one accommodation works, we may choose which one to provide. Furthermore, any accommodation that will impose undue hardship on the School is not considered reasonable.