

Equal Opportunity Employment (Policy #601)

Rocketship is an equal opportunity employer. It is the policy of Rocketship to afford equal employment and advancement opportunity to all qualified individuals without regard to:

- Race
- Color
- Gender (including gender identity and gender expression)
- Sex (including pregnancy, childbirth, breastfeeding, and medical conditions related to such)
- Religious creed (including religious dress and grooming practices)
- Marital/registered domestic partner status
- Age (forty (40) and over)
- National origin or ancestry (including native language spoken)
- Physical or mental disability (including HIV and AIDS)
- Medical condition (including cancer and genetic characteristics)
- Taking of a leave of absence pursuant to the Family Medical Leave Act ("FMLA"), Pregnancy, Disability Leave ("PDL") law, Americans with Disabilities Act ("ADA"), California Family Rights Act ("CFRA"), or the Fair Employment and Housing Act ("FEHA")
- Genetic information
- Sexual orientation
- Military and veteran status; or any other consideration made unlawful by federal, state, or local laws

This policy extends to all employees and to all aspects of the employment relationship, including the hiring of new employees and the training, transfer, promotion, compensation and benefits of existing employees.

To comply with applicable laws ensuring equal employment opportunities to qualified individuals with a disability, Rocketship will make reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee unless undue hardship would result.

Any applicant or employee who requires an accommodation in order to perform the essential functions of the job should contact a School representative with day-to-day personnel responsibilities and request such an accommodation. The individual with the disability should specify what accommodation he or she needs to perform the job. Rocketship Education then will conduct an investigation to identify the barriers that interfere with the equal opportunity of the applicant or employee to perform his or her job. Rocketship Education will identify possible accommodations, if any, that will help eliminate the limitation. If the accommodation is reasonable and will not impose an undue hardship, Rocketship will make the accommodation.

Policy Prohibiting Unlawful Harassment, Discrimination, and Retaliation (Policy #660)

Rocketship is committed to providing a work and educational atmosphere that is free of unlawful harassment, discrimination, and retaliation. Rocketship's policy prohibits unlawful harassment, discrimination, and retaliation based upon: race; color; gender (including gender identity and gender expression); sex (including pregnancy, childbirth, breastfeeding, and related medical conditions); religious creed (including religious dress and grooming practices); marital/registered domestic partner status; age (forty (40) and over); national origin or ancestry (including native language spoken); physical or mental disability (including HIV and AIDS); medical condition (including cancer and genetic characteristics); taking a leave of absence authorized by law; genetic information; sexual orientation; military and veteran status; or any other consideration made unlawful by federal, state, or local laws.

Employees, volunteers, unpaid interns, individuals in apprenticeship programs, and independent contractors shall not be harassed, or discriminated or retaliated against, based upon the characteristics noted above.

Rocketship does not condone and will not tolerate unlawful harassment, discrimination, or retaliation on the part of any employee (including supervisors and managers) or third party (including independent contractors or other person with which Rocketship does business). Supervisors and managers are to report any complaints of unlawful harassment to the School Leader or Department of Human Resources.

When Rocketship receives allegations of unlawful harassment, discrimination, or retaliation, the Department of Human Resources or designee will conduct a fair, timely and thorough investigation that provides all parties an appropriate process and reaches reasonable conclusions based on the evidence collected. The investigation will be handled in as confidential a manner as possible, although complete confidentiality cannot be guaranteed. Complainants and witnesses shall not be subject to retaliation for making complaints in good faith or participating in an investigation. Rocketship is committed to remediating any instances where investigation findings demonstrate unlawful harassment, discrimination, or retaliation has occurred.

Prohibited Unlawful Harassment

- Verbal conduct such as epithets, derogatory jokes or comments or slurs
- Physical conduct including assault, unwanted touching, intentionally blocking normal movement, or interfering with work because of sex, race or any other protected basis
- Retaliation for reporting or threatening to report harassment
- Disparate treatment based on any of the protected classes above.

Prohibited Unlawful Sexual Harassment

Rocketship is committed to providing a workplace free of sexual harassment and considers such harassment to be a major offense, which may result in disciplinary action, up to, and including dismissal, of the offending employee.

Sexual harassment consists of sexual advances, request for sexual favors and other verbal or physical

conduct of a sexual nature, regardless of whether or not the conduct is motivated by sexual desire, when:

- 1) Submission to the conduct is either made explicitly or implicitly a term or condition of an individual's employment
- 2) An employment decision is based upon an individual's acceptance or rejection of that conduct
- 3) That conduct interferes with an individual's work performance or creates an intimidating, hostile or offensive working environment.

It is also unlawful to retaliate in any way against an employee who has articulated a good faith concern about sexual harassment against him or her or against another individual.

All supervisors of staff will receive sexual harassment, discrimination, and retaliation training within six (6) months of their assumption of a supervisory position and will receive further training once every two (2) years thereafter. Such training will address all legally required topics, including information about the negative effects that abusive conduct has on both the victim of the conduct and others in the workplace, as well as methods to prevent abusive conduct undertaken with malice a reasonable person would find hostile, offensive, and unrelated to an employer's legitimate business interests. Abusive conduct includes but is not limited to repeated infliction of verbal abuse, such as the use of derogatory remarks, insults, and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the gratuitous sabotage or undermining of a person's work performance. Supervisors shall also be trained on how to appropriately respond when the supervisor becomes aware that an employee is the target of unlawful harassment. Other staff will receive sexual harassment training and/or instruction concerning sexual harassment in the workplace as required by law.

Each employee has the responsibility to maintain a workplace free from any form of sexual harassment. Consequently, should any individual, in particular those with supervisory responsibilities, become aware of any conduct that may constitute sexual harassment or other prohibited behavior, immediate action should be taken to address such conduct. Any employee who believes they have been sexually harassed or has witnessed sexual harassment is encouraged to immediately report such harassment to the School Leader or Department of Human Resources. See Appendix A for the "Harassment/Discrimination/Retaliation Complaint Form." See Appendix B for the general "Internal Complaint Form."

Sexual harassment may include, but is not limited to:

- Physical assaults of a sexual nature, such as: Rape, sexual battery, molestation or attempts to commit these assaults
- Intentional physical conduct that is sexual in nature, such as touching, pinching, patting, grabbing, brushing against another's body, or poking another's body.
- Unwanted sexual advances, propositions or other sexual comments, such as: Sexually oriented gestures, notices, remarks, jokes, or comments about a person's sexuality or sexual experience.
- Preferential treatment or promises of preferential treatment to an employee for submitting to sexual conduct, including soliciting or attempting to solicit any employee to engage in sexual activity for compensation or reward or disparate treatment for rejecting sexual conduct.
- Subjecting or threats of subjecting an employee to unwelcome sexual attention or conduct or intentionally making performance of the employee's job more difficult because of the employee's sex.

- Sexual or discriminatory displays or publications anywhere at the workplace by employees, such as: Displaying pictures, cartoons, posters, calendars, graffiti, objections, promotional materials, reading materials, or other materials that are sexually suggestive, sexually demeaning or pornographic or bringing to work or possessing any such material to read, display or view at work.
- Reading publicly or otherwise publicizing in the work environment materials that are in any way sexually revealing, sexually suggestive, sexually demeaning or pornographic.
- Displaying signs or other materials purporting to segregate an employee by sex in an area of the workplace (other than restrooms or similar rooms).

The illustrations of harassment and sexual harassment above are not to be construed as an all-inclusive list of prohibited acts under this policy. Moreover, please note that while in most situations a personal relationship is a private matter, these relationships are not appropriate in a professional setting, particularly where one of the parties has management or supervisory responsibilities. As such, consensual relationships in the workplace may violate Rocketship policy.

For employees working in California, in addition to notifying RSED about harassment or retaliation complaints, affected employees may also direct their complaints to the California Department of Fair Employment and Housing (“DFEH”), which has the authority to conduct investigations of the facts. The deadline for filing complaints with the DFEH is one year from the date of the alleged unlawful conduct. If the DFEH believes that a complaint is valid and settlement efforts fail, the DFEH may file a lawsuit in court. Courts have the authority to award monetary and non-monetary relief in meritorious cases. Employees can contact the nearest DFEH office by checking the State Government listings in the local telephone directory or on the agency’s website at <http://www.dfeh.ca.gov/>.

For individuals working in Tennessee, the state governmental agency that handles harassment/discrimination complaints is the Tennessee Human Rights Commission, and for those in Wisconsin, such agency is the Wisconsin Department of Workforce development, Equal Rights Division and for those in Washington, D.C., such agency is the District of Columbia Office of Human Rights.

Whistleblower Policy (#661)

Rocketship Education, Inc. (RSED) requires its directors, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The purpose of this policy is to encourage and enable employees and volunteers of RSED to report any action or suspected action taken within RSED that is illegal, fraudulent, or in violation of any adopted RSED policy, to a source within RSED before turning to outside parties for resolution. This policy applies to any matter which is related to RSED’s business and operations and relates only to those acts of an individual undertaken on behalf of RSED and subject to the direction of RSED. This policy is intended to supplement but not replace RSED’s unlawful harassment and discrimination policies, complaint policies, and/or any other RSED employee policy or grievance procedure, or any applicable state and federal laws governing whistleblowing applicable to nonprofit organizations.

- **Violations; Reporting in Good Faith:** All employees and volunteers of RSED are encouraged to report any action or suspected action taken within RSED that is illegal, fraudulent, or in violation of any adopted policy of RSED (each, a “Violation”). Anyone reporting a Violation must act in good faith, without malice to RSED or any individual inside RSED, and have reasonable grounds for

believing that the information shared in the report indicates that a Violation has occurred. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense that may result in discipline, up to and including termination of employment or volunteer status.

- **No Retaliation:** No employee or volunteer who in good faith reports a Violation or cooperates in the investigation of a Violation shall suffer harassment, retaliation, or adverse employment or volunteer consequences. Any individual within RSED who retaliates against another individual who in good faith has reported a Violation or has cooperated in the investigation of a Violation is subject to discipline, up to and including termination of employment or volunteer status. If an individual believes that someone who has made a report of a Violation or who has cooperated in the investigation of a Violation is suffering from harassment, retaliation or other adverse employment or volunteer consequences, the individual should contact the RSED Compliance Officer. Any individual who reasonably believes he or she has been retaliated against in violation of this policy shall follow the same procedures as for filing a complaint outlined in Section III below.
- **Reporting Process:** If an individual reasonably believes that a Violation has occurred, the individual is encouraged to follow the procedures set forth in Rocketship's complaint policies. Reported Violations will be investigated and handled in accordance with Rocketship's complaint policies.
- **Confidentiality:** RSED encourages anyone reporting a Violation to identify him/herself when making a report in order to facilitate the investigation of the Violation. However, reports may be submitted on a confidential basis by the complainant or may be submitted anonymously by mailing the form to the Compliance Officer at: Rocketship Education, Attn: Compliance Officer, 350 Twin Dolphin Drive, Redwood City, CA 94065 or submitting an email complaint to compliance@rsed.org. Reports of Violations or suspected Violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, to comply with all applicable laws, and to cooperate with law enforcement authorities. Furthermore, RSED will explore anonymous allegations to the extent possible, but will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances from attributable sources.
- **Accounting and Auditing Matters:** The Business Committee is responsible for addressing reported complaints of Violations relating to corporate accounting practices, internal controls or auditing. The Compliance Officer and any RSED employee in the receipt of such a complaint may elect to report the complaint to the Business Committee.

Internal Complaint Review

The purpose of the "Internal Complaint Review Policy" is to afford all employees of Rocketship the opportunity to seek internal resolution of their work-related concerns. All employees have free access to Rocketship to express their work-related concerns.

Specific complaints of unlawful harassment, discrimination, and retaliation are addressed under Rocketship's "Policy Prohibiting Unlawful Harassment, Discrimination, and Retaliation."

Safety, Security, and Health Substance Abuse Policy (Policy #651)

Rocketship is committed to promoting safety and employee health in the workplace and to creating a work environment that is conducive to attaining high work standards. The use of drugs and alcohol by employees can adversely affect the workplace health, safety, and productivity and can damage public confidence and trust in Rocketship Education.

To further its interest in avoiding accidents, to promote and maintain safe and efficient working conditions for its employees, and to protect its business, property, equipment, and operations, RSED has established this policy concerning the use of alcohol and drugs. As a condition of continued employment with RSED, each employee must abide by this policy.

Definitions

For purposes of this policy:

- 1) "Illegal drugs or other controlled substances" mean any drug or substance that (a) is not legally obtainable; or (b) is legally obtainable but has not been legally obtained; or (c) has been legally obtained but is being sold or distributed unlawfully.
- 2) "Legal drug" means any drug, including any prescription drug or over-the-counter drug, that has been legally obtained and that is not unlawfully sold or distributed.
- 3) "Abuse of any legal drug" means the use of any legal drug (a) for any purpose other than the purpose for which it was prescribed or manufactured; or (b) in a quantity, frequency, or manner that is contrary to the instructions or recommendations of the prescribing physician or manufacturer.
- 4) "Possession" means that an employee has the substance on his or her person or otherwise under his or her control.
- 5) "Reasonable suspicion" includes a suspicion that is based on specific personal observations such as an employee's manner, disposition, muscular movement, appearance, behavior, speech or breathe odor; information provided to management by an employee, by law enforcement officials, by a security service, or by other persons believed to be reliable; or a suspicion that is based on other surrounding circumstances.

Prohibited Conduct

The prohibitions of this section apply whenever the interests of RSED may be adversely affected, including any time an employee is:

- 1) On RSED premises, except in accordance with RSED's Alcohol on Campus Policy
- 2) Conducting or performing RSED business, regardless of location
- 3) Operating or responsible for the operation, custody, or care of RSED equipment or other property
- 4) Responsible for the safety of others in connection with, or while performing, RSED-related business.

Alcohol: The following acts are prohibited and will subject an employee to discipline, up to and including immediate discharge:

- 1) The unauthorized use, possession, purchase, sale, manufacture, distribution, transportation, or

- dispensation of alcohol
- 2) Being under the influence of alcohol.

Illegal Drugs: The following acts are prohibited and will subject an employee to discipline, up to and including immediate discharge:

- 1) The use, possession, purchase, sale, manufacture, distribution, transportation, or dispensation of any illegal drug or other controlled substance, including marijuana
- 2) Being under the influence of any illegal drug or other controlled substance, including marijuana.

Prescription Drugs: This policy prohibits:

- 1) The abuse of any legal drug
- 2) The purchase, sale, manufacture, distribution, transportation, dispensation, or possession of any legal prescription drug in a manner inconsistent with law
- 3) Working while impaired by the use of a legal drug whenever such impairment might endanger the safety of the employee or some other person, pose a risk of significant damage to RSED property or equipment; or substantially interfere with the employee's job performance or the efficient operation of the RSED's business or equipment.

Nothing in this policy is intended to prohibit the customary and ordinary purchase, sale, use, possession, or dispensation of over-the-counter drugs, so long as that activity does not violate any law or result in an employee being impaired by the use of such drugs in violation of this policy.

Drug Free Awareness Program

RSED has established a Drug-Free Awareness Program that is designed to inform employees about the dangers of drug abuse in the workplace and to help ensure that employees are familiar with this policy and with the disciplinary actions that can result from a violation of this policy. From time to time, employees will be requested to attend one of the sessions of the Drug-Free Awareness Program. During each such session, employees will be given current information about available programs offering counseling and rehabilitation.

Managers and supervisors should be attentive to the performance and conduct of those who work with them and should not permit an employee to work in an impaired condition or to otherwise engage in conduct that violates this policy. When management has reasonable suspicion to believe that an employee or employees are working in violation of this policy, prompt action will be taken.

Drug Testing

- 1) Reasonable Suspicion Testing: If RSED has reasonable suspicion that the employee is working in an impaired condition or otherwise engaging in conduct that violates this policy, the employee will be asked about any observed behavior and offered an opportunity to give a reasonable explanation. If the employee is unable to credibly or adequately explain the behavior, he or she will be asked to take a drug test in accordance with the procedures outlined below. If the employee refuses to cooperate with the administration of the drug test, the refusal will be handled in the same manner as a positive test result.
- 2) Procedures for Drug Testing: RSED will refer the applicant or employee to an independent,

National Institute on Drug Abuse (NIDA)-certified medical clinic or laboratory, which will administer the test. RSED will pay the cost of the test and reasonable transportation costs to the testing facility. The employee will have the opportunity to alert the clinic or laboratory personnel to any prescription or non-prescription drugs that he or she has taken that may affect the outcome of the test. All drug testing will be performed by urinalysis. The clinic or laboratory will inform RSED as to whether the applicant passed or failed the drug test. If an employee fails the test, he or she will be considered to be in violation of this policy and will be subject to discipline accordingly.

- 3) Acknowledgment and Consent: Any employee subject to testing under this policy will be asked to sign a form acknowledging the procedures governing testing, and consenting to (1) the collection of a urine sample for the purpose of determining the presence of alcohol or drugs, and (2) the release to RSED of medical information regarding the test results. Refusal to sign the agreement and consent form, or to submit to the drug test, will result in the revocation of an applicant's job offer, or will subject an employee to discipline up to and including termination.
- 4) Confidentiality: All drug testing-records will be treated as confidential.

Notification of Criminal Convictions

Employees must notify RSED of any conviction under a criminal drug statute for a violation occurring in the workplace or during any RSED-related activity or event. Employees must notify RSED within five days after any such conviction. When required by federal law, RSED will notify any federal agency with which it has a contract of any employee who has been convicted under a criminal drug statute for a violation occurring in the workplace.

Disciplinary Action

Violation of this policy may result in disciplinary action up to and including immediate termination. An employee who is convicted under a criminal drug statute for a violation occurring in the workplace or during any RSED-related activity or event will be deemed to have violated this policy. Mandatory participation in and satisfactory completion of an inpatient or outpatient drug or alcohol abuse assistance or rehabilitation program may become a condition of continued employment upon violation of this policy.

Alcohol on Campus (Policy #308)

Rocketship strictly prohibits alcohol on school campuses at all times during the instructional school year. This includes times when students are not on campus (i.e. evenings, weekends, or holidays). Alcohol is not to be stored in staff rooms on campus at any time.

However, Rocketship recognizes that schools may encounter rare situations in which it would be appropriate to consume limited amounts of alcohol on campus as part of a social event (i.e. meet-and-greet with community partners).

Alcohol may be permitted on campus in very limited circumstances outside of the instructional school year (i.e. during summer break or before a new campus opens to students), provided that the following circumstances are met:

- Both the Principal and the Human Resources Department must provide advance written approval of the event and the list of attendees.

- All alcohol is removed from the campus following the event.
- All staff members act responsibly and professionally and abide by all applicable school and network conduct policies and rules.

Alcohol is not permitted during holiday breaks that fall within the instructional school year, including winter and spring breaks.

If a staff member wishes to give another staff member alcohol as a gift (i.e. before the holidays or a birthday) during the instructional school year, the exchange must take place off-campus.

Additionally, all Rocketship employees must abide by Rocketship's Substance Abuse Policy, which can be found in the Employee Handbook.

Human Resources must be promptly notified of any violations to this policy. Rocketship Education reserves the right to prohibit any Rocketship campus from consuming alcohol under any circumstances if the campus is found to have violated this policy or otherwise engaged in conduct that would be deemed inappropriate by a reasonable person in light of the circumstances.

Smoke Free Environment (Policy #652)

Rocketship's offices and schools are smoke-free environments. Smoking is not allowed anywhere on a school campus. It is the responsibility of each staff member to adhere to this rule, and to inform his or her guests of our non-smoking policy.