

Confidential and Proprietary Business Record

WORKPLACE EXPECTATIONS

Code of Conduct

As role models for our students, we are committed to upholding the highest standards of integrity and professionalism in everything we do. All employees are expected to uphold these standards. Our Code of Conduct illustrates the shared accountability for working at BASIS.ed with honesty and integrity. The following summarizes our principles and the expectations for all employees:

- Freedom from unlawful harassment through an open and productive work environment
- Avoidance of conflicts of interest such as working for a competitor or pursuing an improper financial benefit for yourself
- Avoidance of the misuse or unauthorized disclosure of confidential, proprietary, or student information
- Conduct of business with vendors and competitors in a fair and honest manner
- Proper utilization and protection of all BASIS.ed and BASIS charter school assets, property and documents
- Encouragement to report illegal or unethical behavior

Employees may report concerns about any business practice or other conduct they believe, in good faith, violates our Code of Conduct, our employment policies including those related to harassment and discrimination, or our expectations for a safe workplace to their supervisor, Human Resources, or anonymously by using the **Ethics Hotline** – a toll free hotline: **(877) 472-2110** (English) or **(800) 216-1288** (Spanish).

BASIS.ed treats all such concerns seriously and will investigate all claims of misconduct (including harassment and discrimination), unethical practices, and unsafe working conditions.

Equal Employment Opportunity

It is our policy to foster and provide a positive work environment that encourages and supports a high level of contribution from all of our employees. In accordance with all local, state, and federal laws including, but not limited to, Title VI 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 as amended, and the Boy Scouts of America Equal Access Act, BASIS.ed does not discriminate on the basis of race, color, religion, national origin, sex, gender, pregnancy, age, disability, sexual orientation, gender identity or expression, marital or familial status, genetic information, military status, citizenship status or any other classification protected by law. BASIS.ed is committed to providing an equal employment opportunity in all aspects of employment including recruitment, hiring, training, compensation, promotion, transfer, disciplinary action, and separation, as well as in its educational programs and activities which comply fully with the requirements of state and federal law.

Harassment-Free Workplace

BASIS.ed is committed to providing a professional and productive work environment for all employees, free from any form of unlawful harassment or discrimination. As such, BASIS.ed strictly forbids harassment or bullying based on race, color, religion, national origin, sex, gender, pregnancy, age, disability, sexual orientation, gender identity or expression, marital or familial status, genetic information, military status, citizenship status or any other classification protected by law, whether it is verbal, physical, or environmental. BASIS.ed does not tolerate harassment of employees by managers, supervisors, co-workers, or non-employees with whom BASIS.ed has a business, service, or professional relationship (e.g., students and their parents, vendors, or suppliers). Similarly, BASIS.ed does not tolerate harassment by its employees of non-employees with whom BASIS.ed has a business, service, or professional relationship.

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Harassment includes verbal, physical, or written conduct that intentionally or unintentionally interferes with an individual's work performance, or creates an intimidating, hostile, or offensive work environment. Prohibited behaviors include, but are not limited to:

- **Verbal Harassment:** Epithets, derogatory comments, slurs or jokes about or based on a protected characteristic.
- **Physical Harassment:** Pushing, shoving, kicking, intentionally tripping, assaulting or threatening physical assault; damage to a person's work area or property.
- **Written Harassment:** Cartoons, emails, posters, drawings, or photographs about or based on a protected characteristic.

Sexual Harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal, physical or written conduct that creates a hostile, offensive, or uncomfortable environment. Such conduct is a violation of BASIS.ed's policies, as well as federal and state law, when:

- Submission to the conduct is made either explicitly or implicitly as a term or condition of employment;
- Submission to, or rejection of, the conduct is used as the basis for an employment decision;
- The conduct has a purpose or effect of unreasonably interfering with an individual's work performance or creates an intimidating, hostile, or offensive work environment.

Examples of sexual harassment include, but are not limited to:

- **Verbal Sexual Harassment:** unwelcome sexually-oriented or suggestive comments, teasing, sexually suggestive sounds, jokes, foul or obscene language, language of a sexual nature, gossiping or questioning of another person's sex life, propositioning another employee for sex, repeated requests for dates, or preferential treatment or promises of preferential treatment to an employee for submitting to sexual conduct.
- **Physical Sexual Harassment:** unwelcome touching, grabbing, fondling, kissing, massaging, brushing up against another's body, or inappropriate looks or gestures.
- **Written Sexual Harassment:** sexually suggestive or obscene pictures, cartoons, posters, calendars, notes, letters and emails.

Procedures for Reporting Harassment

Any employee who feels that he or she may be a victim of harassment must report the situation. BASIS.ed embraces an open door culture, allowing employees to discuss concerns outside of their direct leadership. Employees may choose to report claims of harassment to their supervisor, their supervisor's supervisor, the Director of Human Resources, the Vice President of Operations, or the BASIS.ed Ethics Line (a toll free hotline where employees may remain anonymous) at (877) 472-2110.

Promptly after receiving a complaint, BASIS.ed will fully investigate and take all steps necessary to prevent harassment, discrimination, or retaliation. BASIS.ed or its representative will promptly investigate all complaints and BASIS.ed will impose appropriate discipline where it determines that discrimination, harassment, or retaliation has occurred in violation of this policy.

All complaints shall be kept confidential, to the fullest extent possible, to permit BASIS.ed to conduct a thorough investigation. However, BASIS.ed cannot guarantee complete confidentiality. Witnesses to discrimination or harassment and victims of discrimination or harassment shall not be retaliated against in any way for making a good faith complaint or for cooperating in an investigation. Employees who interfere with any investigation will be subject to discipline up to and including termination.

Retaliation against a person who reports, complains about, or participates in an investigation of harassment or discrimination is prohibited and a violation of this policy. Allegations of retaliation will be investigated pursuant to

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the procedures described above. Employees found to have violated this policy will be subject to discipline, up to and including, termination.

Making a knowingly false charge of discrimination, harassment or retaliation against another co-worker, or against a client or vendor, is strictly prohibited and is also considered a violation of this policy.

BASIS.ed obviously cannot work to resolve unlawful harassment or discrimination concerns unless it knows about them. Prompt reporting of any problems is, therefore, essential to us. It is your responsibility to bring these issues to our attention so that we can take the necessary steps to correct the problem. Any supervisor or manager who becomes aware of any incident of discrimination, harassment or retaliation must immediately report the matter as set forth in this policy. Supervisors or managers who fail to report such matters may be subject to discipline, up to and including, termination.

Americans with Disabilities Act

The Americans with Disabilities Act as amended (ADAAA) prohibits employers from discriminating against applicants and individuals with disabilities, and requires employers, when needed, to provide reasonable accommodations to applicants and employees who are qualified for a job, with or without reasonable accommodations, so that they may perform the essential job duties of the position.

It is the policy of BASIS.ed to comply with all federal, state, and local laws concerning the employment of persons with disabilities. Furthermore, it is the policy of BASIS.ed not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions and privileges of employment.

BASIS.ed will reasonably accommodate qualified individuals with disabilities so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation and/or if the accommodation creates an undue hardship to BASIS.ed. Contact Human Resources with any questions or requests for accommodation.

Violence in the Workplace

Employees are expected to refrain from conduct that may be physically harmful or dangerous to others.

Conduct that threatens, intimidates or physically coerces another employee, student, visitor, vendor, or business associate will not be tolerated. BASIS.ed resources may not be used to threaten, stalk, or unlawfully harass anyone at the workplace or outside the workplace. BASIS.ed treats threats coming from an abusive personal relationship as it does other forms of violence.

Indirect or direct threats of violence, incidents of actual violence and suspicious individuals or activities should be reported as soon as possible to a supervisor, Human Resources, or another member of management. When reporting a threat or incident of violence, employees should be as specific and detailed as possible. Employees should not place themselves in peril, and should not attempt to intercede during an incident. If you observe an incident or threat of violence (actual or perceived) that is immediate and serious, IMMEDIATELY DIAL 9-1-1 and report it to the police.

BASIS.ed will promptly and thoroughly investigate the circumstances surrounding a report of conduct in violation of this policy. BASIS.ed will attempt to keep such investigations confidential and will disclose reported information only as necessary to investigate and resolve the matter. No employee who in good faith makes a complaint or report of conduct violation of this policy, or who in good faith participates in an investigation pursuant to this policy, will be retaliated against by BASIS.ed or by any employee.

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It is the policy of BASIS.ed to strictly prohibit the possession or carrying of firearms, and other weapons, on BASIS.ed and BASIS.ed charter school property, while on BASIS.ed business or while in a BASIS.ed-owned vehicle unless otherwise expressly permitted by applicable state law. BASIS.ed reserves the right to conduct searches of work areas, lockers, desks, cubicles and personal items including, but not limited to, purses, briefcases, backpacks and bags for compliance with this policy.

BASIS.ed encourages employees to bring their concerns to the attention of their supervisors or Human Resources before the situation escalates. Anyone found to be responsible for threats of violence, actual violence, possession of a weapon, or other conduct that is in violation of these guidelines will be subject to prompt disciplinary action up to and including termination of employment.

Preventing Abuse and Exploitation of Minors

As educators we must create and maintain an environment that prevents exploitation and abuse of minors. Our employees who have direct contact with children have a legal duty as mandated reporters to report any suspected abuse or neglect (including any abuse or neglect that the employee believes may occur in the future) to the relevant governmental authority immediately after the employee first suspects the child has been or may be abused or neglected.

Employees may not delegate to or rely on another person to make the report. Additionally, all employees must report to their Supervisor any concerns, including both specific complaints and rumors, regarding possible exploitation, neglect, or abuse of a minor. However, the report to the Supervisor must be in addition to and not in lieu of any report to the relevant authorities. Failure to report such information will result in disciplinary action up to and including termination.

Conflicts of Interest

A conflict of interest occurs when an individual has financial investments or interest that is inconsistent with the interests of BASIS.ed, competes with BASIS.ed, or exploits his or her position with BASIS.ed for personal gain.

The following are examples of actions that would constitute a conflict of interest

- Investing in or serving as board member or advisor to any organization that sells products or services to BASIS.ed, or any company doing or seeking to do business with BASIS.ed;
- Working for or on behalf of any competitor of or supplier to BASIS.ed;
- Accepting bribes, kickbacks, or gratuities of any kind;
- Working for another company where such work conflicts with an employee's duties and responsibilities at BASIS.ed either in terms of a time commitment or because the other company is a competitor of BASIS.ed, sells products or services to BASIS.ed or otherwise does or seeks to do business with BASIS.ed; or
- Having a personal relationship with another employee or vendor that affects an employee's ability to do his/her job.

Employees who feel they may have a conflict of interest must contact their supervisor or their divisional vice president. If a determination of conflict of interest is not resolved, it will be referred to Human Resources for a determination. If it is determined that a conflict does, in fact, exist, the employee may be asked to sever the relationship, or otherwise rectify the situation as applicable (i.e. returning gratuities, etc.). If the conflict of interest is deemed to be more significant, the employee may face corrective action, up to and including termination.

Conditions for Employment

All employees must provide the legally-required proof of identity, be authorized to work in the United States (in compliance with Immigration Reform and Control Act of 1986), possess and maintain, at the employee's

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Outside Employment

Employees are permitted to engage in outside work or to hold other jobs, subject to certain restrictions as outlined below and only if the outside employment is disclosed to the Supervisor.

Activities and conduct away from the job must not compete or conflict with BASIS.ed's business interests (i.e., employment with a competitor or vendor), or adversely affect job performance and the ability to fulfill all job responsibilities.

Employees are prohibited from performing any services for customers during nonworking time that are normally performed by BASIS.ed. This prohibition also extends to the unauthorized use of any BASIS.ed resources or equipment and the unauthorized use or application of any confidential information. In addition, employees are not to solicit or conduct any outside business during working time, as defined above.

Outside employment will not be considered an excuse for poor job performance, absenteeism, tardiness, leaving early to meet another work schedule, or refusal to travel, work overtime or work different hours due to the employee's work schedule with another employer. If BASIS.ed determines that an employee's outside work interferes with performance, the employee may be required to terminate the outside employment.

Drug-Free Workplace

BASIS.ed has a longstanding commitment to provide a safe and productive work environment. Drug (including alcohol) abuse poses a threat to the health and safety of employees and to the security of our equipment and facilities. For these reasons, BASIS.ed is committed to a drug-free workplace.

Employees are prohibited from possessing, consuming, selling, manufacturing, transporting, or using illegal drugs, or being under the influence of any legal or illegal drugs while performing company business, or while at a company facility or worksite. Employees must report to work fit for duty and free of any adverse effects of legal or illegal drugs. An employee who is taking a prescription drug which may impact his/her ability to safely, effectively, and efficiently perform any aspect of the position is required to notify Human Resources prior to the start of his/her shift.

Employees suspected of violating the Drug-Free Workplace policy may be required to submit to a blood test, urinalysis, hair test, breath alcohol test, or other drug screening. If an employee refuses to complete the required screening, fails to report timely for a required screening, or tests positive for drug and/or alcohol impairment, the employee may face corrective action up to and including termination.

This policy does not prohibit employees from the lawful use and possession of prescribed medications or over-the-counter drugs. Employees must, however, consult with the appropriate health care provider about the medication's effect on their fitness for duty, and their ability to work safely. An employee who has been given any restrictions from his/her health care provider which may impact his/her ability to perform the job, must promptly disclose the restrictions to the supervisor. Employees should not, however, disclose underlying medical conditions to their supervisor.

Registered medical marijuana card holders are bound by the same expectations as any other legal drug user, including remaining fit for duty at all times while on the job. BASIS.ed complies with state law as it pertains to the accommodation of registered medical marijuana users. However, even if an employee's or applicant's use of marijuana may otherwise be permissible under state law, the use or possession of marijuana on BASIS.ed or BASIS.ed charter school premises or while on BASIS.ed business is strictly prohibited. Also, notwithstanding otherwise permissible use of marijuana under state law, being impaired on BASIS.ed or BASIS charter school premises, while on BASIS.ed business, or in a BASIS.ed vehicle is strictly prohibited.

Employees working on federal contracts or in federally regulated positions will remain subject to the federal drug testing requirements applicable to their positions. Additionally, BASIS.ed may exclude an employee from

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performing a position designated as a safety-sensitive position if the use of marijuana could cause an impairment or otherwise decrease or lessen the employee's job performance or ability to perform the employee's duties. Company sanctioned events where alcohol is provided are exempt from the alcohol provision of this policy.

Smoke Free Workplace

BASIS.ed prohibits smoking on all company premises buildings and within 20 feet of any building, entrance, open windows or ventilation systems in order to provide and maintain a safe and healthy work environment for all employees. The law defines smoking as the act of lighting, smoking or carrying a lighted or smoldering cigar, cigarette, e-cigarette or pipe of any kind.

This policy applies to:

- All areas of company buildings.
- All company-sponsored off-site conferences and meetings.
- All vehicles owned or leased by the company.
- All contractors and consultants and/or their employees working on the company premises.
- All employees, temporary employees or interns, visitors and vendors to the company premises.

Smoking may be permitted in parking lots outside of the distance from the doors if required by local law, in the employee's personal car or in designated areas per specific building rules. Employees who violate the smoking policy will be subject to disciplinary action up to and including immediate discharge.

Confidentiality

Our parents, students, co-workers, and business partners entrust the company with important information that is confidential or proprietary including personally identifiable student information, education records, personal health information, social security numbers, financial metrics, bank account information, intellectual property, and proprietary business information (e.g. licensed curriculums or teaching materials) that must not be disclosed to competitors, unlicensed individuals or entities, employees, and with respect to student information, anyone without a "need to know." If an employee questions whether certain information is considered confidential, he/she should first check with his/her immediate supervisor. Our intent is to alert employees to the need for discretion at all times and is not intended to inhibit normal or legally protected communications.

FERPA

Family Education Rights and Privacy Act (FERPA) is a Federal law that protects the privacy of student education records. Some employees may have access to student education records in connection with their employment. Student education records include all names, addresses, records, files, documents, and other materials that contain personally identifiable information on any student, as well as the personally identifiable information itself (including student grades and test scores). All employees must agree to maintain the confidentiality of all student education records that the employee may generate or to which the employee may be given access as part of his/her employment.

This means that all employees agree not to disclose student education records or personally identifiable student information in such records to any person other than other bona fide BASIS.ed employees. Employees may not take any confidential student records off a BASIS.ed or BASIS.ed charter school site unless specifically authorized by employee's direct supervisor. All employees need to understand and agree that failure to maintain the confidentiality of all student education records to which they may be given access may result in disciplinary action or termination of employment with BASIS.ed. Violating a student's confidentiality is against the law.

All charter schools are directly subject to FERPA.

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COMMUNICATIONS AT BASIS.ed

Open Door

BASIS.ed has adopted an Open Door Policy for all employees. This means that every supervisor's or manager's door is open to every employee. The purpose of our Open Door Policy is to encourage open communications, feedback and discussion about any matter of importance to an employee. Our Open Door Policy means that employees are free to talk with any manager at any time.

Whether there is a problem, a complaint, a suggestion or an observation, we want to hear from our employees. By listening to our employees, BASIS.ed is able to improve, to address concerns and to foster employee understanding of the rationale for practices, processes and decisions. For concerns where the employee wishes to remain anonymous, the employee may reach out to BASIS.ed's Ethics Line at (877) 472-2110.

Electronic Information Systems

- The following guidelines have been established for using the internet, company-provided cell phones and e-mail in an appropriate, ethical and professional manner: BASIS.ed recognizes that there may be incidental personal use of BASIS.ed electronic information systems, which is permitted as long as it does not interfere with job duties and does not violate any law or BASIS.ed policy. All employees take responsibility for and accept the duty to actively protect BASIS.ed information assets.
- Employees are prohibited from downloading or installing files or software on company equipment unless approved by their leader.
- Employees are prohibited from sharing their passwords, or company passwords, for company equipment or site access.
- Employees are prohibited from looking at, sending, posting, or otherwise interacting with inappropriate information or material using company equipment or systems, such as:
 - Proprietary or confidential information of BASIS or a competitor; or
 - Material not suitable for the workplace based on BASIS.ed's policies and/or the law, such as sexual content, violence or threats of violence, or discriminatory or unlawfully harassing jokes, photos, and drawings related to a person's race, color, religion, national origin, ancestry, sex, age, medical condition, marital or domestic partner status, sexual orientation, gender identity, genetic information, mental or physical disability, military/veteran status, pregnancy status, political belief or any other status or characteristic protected by law.
- Employees are required to respond to all spoliation/legal hold notices when requested.
- Employees are only permitted to attach personal electronic devices to the company network at the company's discretion.
- Employees are prohibited from using cell phones while driving or on company business. Prohibited uses include talking, sending or reading text messages, sending or receiving emails, or other such activity without the use of a hands-free device.
- Employees should have no expectation of privacy with their work emails or when accessing the internet using BASIS.ed resources. Internal and external emails sent using BASIS.ed electronic communications systems are considered BASIS.ed property and business records and may be subject to discovery in the event of a business need or in the case of litigation. Employees should expect that all information created, transmitted, downloaded, received or stored in BASIS.ed computers or mobile devices accessing BASIS.ed electronic communications systems may be accessed by BASIS.ed at any time, without prior

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notice. Employees should not assume that they have an expectation of privacy or confidentiality in any message or information (whether or not such messages or information is password protected) contained on BASIS.ed electronic communication systems or that deleted messages are necessarily removed from the system and no longer accessible by BASIS.ed.

- Contents of electronic messaging may be monitored and the use of electronic communication systems will be monitored to support operational, maintenance, auditing, security, and investigative activities. BASIS.ed reserves the right to disclose any electronic messages to law enforcement officials without prior notice to any employees who may have sent or received such messages.

Social Media

You are responsible for what you write or do online and you should remember that your comments could be shared beyond your intended audience and that you may not be able to delete or remove them. Employees are not permitted to post information on any social media outlet while on working time, as defined above, unless such activity has been deemed necessary for their job. Confidential information such as personally identifiable student information, education records, personal health information, social security numbers, financial metrics, bank account information, intellectual property, and proprietary business information (e.g. licensed curriculums or teaching materials), is never to be shared on social media outlets. Employees are not permitted to speak on behalf of the company through social media outlets (as is the case with all media outlets) unless media correspondence is a requirement of their position. Any dialogue on social media that is deemed to be unlawfully harassing or discriminatory will not be tolerated.

Good Faith Reporting

Employees may report concerns about any business practice or other conduct they believe, in good faith, violates state or federal law, or raises serious safety concerns, to their supervisor, to Human Resources, or anonymously by using the BASIS.ed Ethics Line - a toll free hotline - at (877) 472-2110 (English) or (800) 216-1288 (Spanish). BASIS.ed treats all such concerns seriously. During any resulting investigation, the caller's identity will be protected to the extent possible. The complainant will receive notice of the results of any investigation pursuant to applicable law.