

Sela PCS – Employee Policies – SY2022-2023

1. ANTI-DISCRIMINATION AND ANTI-SEXUAL HARASSMENT POLICY

As stated in §2.3, Sela PCS is committed to providing a work environment in which all employees are treated with decency and respect. Accordingly, Sela PCS has a zero-tolerance policy toward discrimination and sexual harassment. If an employee is found to have engaged in prohibited discrimination or sexual harassment as defined below, they are subject to discipline up to and including immediate termination. All persons, whether an employee of Sela PCS or a student at Sela PCS, are covered by the Anti-Discrimination and Anti-Sexual Harassment Policy outlined in this section. Sela PCS does not condone or tolerate any form of discrimination or sexual harassment involving employees or students. The school is committed to the creation and maintenance of a work environment in which all employees work in an atmosphere free from all forms of discrimination and sexual harassment.

Discrimination is treating someone less favorably because of their membership in a protected class. Harassment is verbal or physical conduct that denigrates or shows hostility toward a person based upon that person's membership in a protected class, and that has the purpose or effect of creating a hostile work environment; has the purpose or effect of interfering with the individual's work performance; or otherwise adversely affects an individual's employment opportunities.

Discrimination and harassment can occur in one-on-one interactions or in group settings. In addition to the office or any other primary location to which you report, discrimination can also occur anywhere the job takes you, such as an off-site business meeting or a school-sponsored event, and during working and non-working hours. Discrimination and harassment can be committed by a superior, a subordinate, a coworker, or anyone with whom Sela PCS does business or with whom employees may interact, including a contractor, vendor, customer, client, investor, agent, or visitor of the Company.

Sexual harassment does not refer to occasional compliments of a socially acceptable nature or consensual personal and social relationships without a discriminatory employment impact. While Sela PCS does not condone consensual sexual relationships between co-workers, if it does occur, employees must recognize the potential conflict of interest that exists where an individual may be improperly influenced by the existence of said personal or sexual relationship. Therefore, this situation should be avoided, but emphatically in situations where one of the parties supervises or evaluates the other.

Sela PCS defines sexual harassment as unwelcome written, verbal, or non-verbal sexual conduct that creates an offensive or hostile working environment. Such conduct rises to the level of sexual harassment when it has the effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment (hostile work environment sexual harassment). Sexual conduct also rises to the level of sexual harassment when the submission to or rejection by any individual of unwelcome sexual conduct is used as a basis for employment related decisions such as performance evaluations or, more overtly working at Sela PCS (quid pro quo sexual harassment). Lastly, sexual conduct rises to the level of sexual harassment when submission to unwelcome sexual advances is explicitly or implicitly made a term or condition of an individual's employment.

Sexual harassment may involve unwelcome verbal or written conduct including but not limited to slurs, crude remarks, vulgarity, lewd/suggestive comments/noises, nicknames,

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teasing, or offensive discussions or questions. Sexual harassment may also involve unwelcome visual imagery including but not limited to offensive or suggestive images, graphics, or objects such as photographs, magazines, mouse pads, physical movements or gestures such as leering and following. Sexual harassment may also involve unwelcome physical conduct of a sexual nature including but not limited to, the touching of another person's body, the touching or displaying of one's own body, or any similar contact. Sexual harassment may occur between people of the same or opposite sex, provided that it is directed against the person based on his or her sex.

Examples of conduct that Sela PCS prohibits, when the conduct is based on discrimination or harassment, including on the basis of gender and is unwelcome, include but are not limited to: (1) verbal harassment (e.g., epithets, derogatory comments, sexual requests, comments, jokes, slurs, etc.); (2) physical harassment (e.g., assault, pinching, patting, grabbing, physical contact or blocking movement, etc.); (3) visual harassment (e.g., derogatory or offensive posters, gestures, cartoons, e-mails or drawings of a sexual nature, writings or objects, etc.) and (4) cyber harassment (e.g., using electronic communication, such as e-mail, instant messaging chat, messages posted to a website, blog, social media or any other form of electronic communication that may be used to engage in the visual or verbal harassment of another employee).

As discussed in §2.3, this anti-discrimination and anti-harassment policy is far reaching geographically and reaches any Sela PCS employee, student or third party. Sela PCS will take appropriate action to prevent and correct behavior that violates this policy. If necessary, the school will also take disciplinary action against employees. Employees who violate the policy will be subject to such actions as oral or written reprimand, professional counseling, reassignment, demotion, suspension or termination.

2. EQUAL OPPORTUNITY & ANTI-HARRASSMENT POLICY

Sela PCS is an equal opportunity employer and complies with all applicable federal and District of Columbia fair employment practices. Sela PCS strictly prohibits and does not tolerate discrimination against employees or applicants because of race, color, sex (including pregnancy, breastfeeding, etc.), age, religious beliefs, national origin, disability, gender, gender identity or expression, marital status, U.S. veteran status, sexual orientation, genetic information, personal appearance, matriculation, political affiliation, creditworthiness, or any other status protected by law. Our equal employment opportunity commitment applies to all terms and conditions of employment including, but not limited to, hiring, placement, promotion, termination, discipline, layoff, recall, leaves of absence, training, benefits and compensation.

Sela PCS also complies with the Americans with Disabilities Act (ADA), as amended, as well as similar District of Columbia law. Consistent with those requirements, Sela PCS will reasonably accommodate qualified individuals with a disability if such accommodation would allow the individual to perform the essential functions of the job, unless doing so would create an undue hardship. If you believe you need an accommodation, please make a request to your immediate supervisor or Human Resources. Sela PCS will also, where appropriate, provide reasonable accommodations for an employee's religious beliefs or practices.

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Further, Sela PCS is committed to providing a work environment in which all employees are treated with decency and respect. Accordingly, Sela PCS prohibits any harassment on the basis of race, color, sex, age, religious beliefs, national origin, disability, gender, gender identity or expression, marital status, U.S. Veteran status, sexual orientation, genetic information, personal appearance, matriculation, political affiliation, creditworthiness or any other status protected by law. This is a zero-tolerance policy. Prohibited conduct 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. Such prohibited conduct may also include written or graphic material placed on walls, bulletin boards or elsewhere on Sela PCS's premises, included in emails, or circulated in the workplace that denigrates, shows hostility or aversion towards an individual or group because of the characteristics identified above. While such behavior, depending on the circumstances, may not be severe or pervasive enough to create a hostile work environment, it can nonetheless make co-workers uncomfortable.

Please also be reminded that Sela PCS computers and the data generated on, stored in, or transmitted to or from Sela PCS computers are the property of Sela PCS for all purposes. Therefore, Sela PCS expressly cautions employee use of Sela PCS e-mail, voicemail, fax, telephone, cell phone or other electronic messaging systems, or the Internet as these may form the basis of a complaint for unlawful harassment or discrimination. If an employee receives an offensive message, the employee should report said message to the Human Resources Representative.

Keeping this in mind, the offensiveness of any prohibited conduct is subjective, and the fact that an employee does not find a particular statement or image offensive does not mean that everyone shares that view. Geographically, these standards apply not just on the Sela PCS campus, but anywhere a work-related function or activity is taking place. Furthermore, these standards apply to everyone, not just Sela PCS employees and students, but to all third parties including prospective employees, clients, vendors, and persons who come in contact with Sela PCS. Accordingly, any offensive behavior is inappropriate and may result in disciplinary action, up to and including termination of employment, regardless of whether it is unlawful.

3. DRUG AND ALCOHOL USE

Sela PCS is committed to providing a healthy, safe, and drug-free workplace and to fostering the well-being and health of our employees. We recognize that alcohol abuse and drug use pose a significant threat to these goals. Sela PCS has established a drug-free workplace program that balances our respect for individuals with the need to maintain an alcohol and drug-free environment. That commitment is jeopardized when any Sela PCS employee abuses alcohol or illegally uses drugs on the job; comes to work under their influence; or possesses, distributes, or sells any controlled substances in the workplace. Employees are expected to report for work in fit-for-duty condition and to perform their jobs in at least a satisfactory manner as determined by the company. Any individual who conducts business for the school, is applying for a position of employment, or is conducting business on the school's property is covered by our drug-free

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workplace policy. Sela PCS encourages employees to voluntarily seek help with drug and alcohol problems.

While on Sela PCS's premises or conducting official business for Sela PCS off-premises, no employee may:

- Use, manufacture, possess, distribute, sell, trade, or offer for sale any illegal drugs, including prescription drugs for which the employee has no valid prescription,
- Drink alcohol on the job except as authorized under this policy at approved social-business functions, or
- Report to work under the influence of alcohol or illegal drugs.

A safe and productive drug-free workplace is achieved through cooperation and shared responsibility. Both employees and management have important roles to play. All employees are required to not report to work or be subject to duty while their ability to perform job duties is impaired due to on- or off-duty use of alcohol or other drugs. In addition, employees are encouraged to:

- Be concerned about working in a safe environment.
- Support fellow employees in seeking help.
- Report dangerous behavior to their supervisor.

It is the supervisor's responsibility to:

- Inform employees of the drug-free workplace policy.
- Observe employee performance.
- Investigate reports of dangerous practices.
- Document negative changes and problems in performance.
- Counsel employees as to expected performance improvement.
- Clearly state consequences of policy violations.

Employees are permitted to consume alcoholic beverages during social gatherings on company premises or off-site at functions authorized or sponsored by the school with prior approval. Before the scheduling of such an event, employees must obtain approval from the Head of School. Employees attending such events must plan for safe transportation afterwards, such as an alcohol-abstaining designated driver or use of a taxi, car service or ride-share service. Moreover, employees should use good judgment and make similar arrangements for safe transportation for any event not sponsored by the school involving co-workers, contractors, students/parents, or vendors at which alcohol is served. While it is the personal decision of an individual to lawfully use alcoholic beverages, it is essential that such use does not interfere with the safe performance of your job duties or reduce your dependability. No employee should consider alcohol use a business obligation at any time.

Employees suspected of possessing or using alcohol or illegal drugs on Sela PCS's property are subject to inspection and search, with or without notice. Employees' personal belongings, including any bags, purses, and clothing, are also subject to inspection and search, with or without notice. If Sela PCS has a reasonable suspicion that an employee is under the

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influence of alcohol or illegal drugs, Sela PCS reserves the right, in its sole discretion, to require such employee to undergo alcohol and/or drug testing as described below.

4. STAFF COMPLAINT AND RESOLUTION PROCESS

At Sela PCS, we strive to maintain good employee relations and to foster a fair and enjoyable workplace. Unfortunately, situations sometimes arise where employees are not comfortable with their work environment, whether physical or personal, and elect to file a grievance. Employees are expected to seek resolution through appropriate supervisory channels within Sela PCS (including meeting with the Head of School) before bringing a concern to the Board. Our goal is to provide a prompt, friendly, and mutually satisfactory settlement of differences as soon as possible. If it is not possible to reach a resolution by working with supervisory staff and the Head of School then staff may file a complaint with the Board of Trustees.

The purpose of the process is to provide employees with opportunities to address conditions perceived unfavorable to them that affect their employment with Sela PCS. Grievances may be either general in nature or personal to the employee:

- Conditions that are general in nature typically involve something physical in the work environment such as the temperature in the facility, the noise level in the work area, or a procedural requirement or recommendation. For issues of this type, we encourage you to use staff meetings to express your concerns.
- Conditions that are personal may involve performance evaluations, supervisory or peer conflict, perception of unfairness, termination from employment, or a hostile work environment. We facilitate resolution of these issues by discussing them in confidence and sharing details on a need-to-know basis.

Sela PCS requires that this grievance process be followed for all situations. Typically, the employee and a member of the Administrative Team meet to attempt to resolve the grievance. The goal is to achieve resolution at the lowest level possible while working up the chain of command as necessary.

At a minimum, you must provide the Head of School with a written communication providing notice of the concern and the desired resolution, prior to advancing to the next phase of the process.

For issues that cannot be resolved after engaging the Administrative team, the Board complaint process is followed.

The second phase of the Grievance Process begins when a staff member submits the Board Complaint Form. We advise you to attach a narrative that details your concern in the form of a formal memorandum. The complaint should also include:

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- Any written communication between the employee and his/her supervisor concerning the matter.
- The employee's written communication with the Head of School giving notice of the concern.
- The Head of School's written response to the concern.
- Establish that no reasonable and satisfactory solution has been reached.
- Suggest a reasonable solution for the Board to consider.

A complaint must be filed in writing within two weeks from the date when the employee became aware of the issue about which s/he is grieving. Complaints will be addressed to the Board Chair. A copy of any complaint must be sent to the Head of School. The Board Chair shall make a thorough review of the complaint and meet with the parties before making a final written decision.

The Board Chair will render a written decision to the employee, setting forth the basis for the decision within 30 days of a complaint submission. This shall be the final level of appeal. The complaint and the Board's reply will become a part of the employee's personnel file.

5. WHISTLEBLOWER POLICY

No employee of Sela PCS or person acting on behalf of Sela PCS in attempting to comply with any policy established by Sela PCS (including ethics, conflicts, or anti-fraud) shall:

- Be dismissed or threatened to be dismissed;
- Be disciplined or suspended or threatened to be disciplines or suspended;
- Be penalized or any other retribution imposed, or
- Be intimidated or coerced,

Based to any extent upon the fact that the employee has reported an incident or participated in an investigation in accordance with the requirements of this Policy. Violation of this section of the Policy will result in disciplinary action, up to and including dismissal.