

Harassment Policy

We believe that each of us should be able to work in an environment free from any form of harassment, including race, gender, sexual orientation, religion, or any other characteristic protected by law. To ensure that all of us enjoy a harassment-free workplace, we prohibit any offensive, physical, written or spoken conduct of a sexual or derogatory nature or based on any other characteristic protected by law. Anyone engaging in sexual or other harassment will be subject to discipline, up to and including termination.

The very nature of harassment makes it difficult to detect unless the problem is reported. Employees experiencing or observing harassment, therefore, are strongly encouraged to file complaints. Complaints should be directed to the employee's manager or immediate supervisor or any other member of the administration with whom the employee feels comfortable.

Complaints will be treated as confidentially as possible in light of the School's need to fully investigate the matter and take appropriate disciplinary action. In all cases, great care will be taken to preserve the dignity and privacy of all persons involved. Employees who report harassment or who assist in the investigation of a complaint of harassment will not be subject to retaliation of any kind.

Complaints will be promptly and thoroughly investigated. Depending on the nature of the alleged harassment, interim measures may be taken. These measures might include temporary reassignments or separating the alleged harasser and the employee alleging the harassment. If the investigation reveals that an employee has engaged in sexual or other harassment, that employee will be subject to disciplinary action, up to and including termination.

All managers and supervisors are responsible for the implementation of this policy and for ensuring that employees know and understand this policy. All managers and supervisors will be held responsible and accountable for eliminating prohibited conduct. However, if it is determined after an investigation that an employee willfully and intentionally provided false information regarding the complaint, that individual will be subject to disciplinary action, up to and including termination.

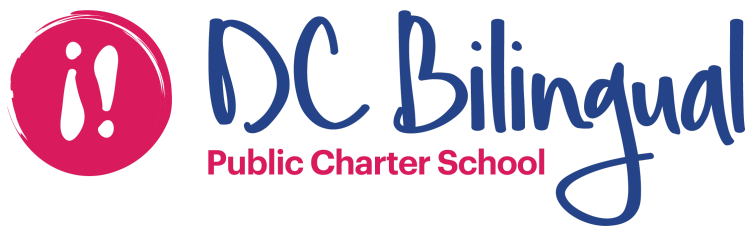
Equal Employment Opportunity Statement

The School provides equal employment opportunities (EEO) to all employees and applicants for employment without regard to race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, disability, genetic information, marital status, amnesty or status as a covered veteran in accordance with applicable federal, state and local laws. The School complies with applicable state and local laws governing nondiscrimination in employment. This policy applies to all



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terms and conditions of employment, including but not limited to hiring, placement, promotion, termination, layoff, recall, transfers, leaves of absence, compensation and training.

The School expressly prohibits any form of unlawful employee harassment based on race, color, religion, gender, sexual orientation, gender identity, national origin, age, genetic information, disability or veteran status, sex, marital status, personal appearance, family responsibilities, matriculation, or political affiliation of any individual.

Drug and Alcohol-Free Workplace

As a part of the School's ongoing commitment to a safe and healthy work environment, we maintain a drug-free workplace. Any employee who reports to work while under the influence of drugs or alcohol runs the risk of endangering his/her safety and the safety of others, destruction of or damage to personal or School property, and a loss of productivity and workplace morale.

All employees must comply with the School's policy. Failure to comply with the guidelines of this policy can result in disciplinary action, up to and including termination.

It is unlawful to manufacture, distribute, dispense, possess, use, and/or be under the influence of a controlled substance, including cannabis and alcohol, while on school property. The serving of alcohol at an official event that occurs during non-working hours may be approved by a member on the administration team.

Leave may be granted for medical treatment if the employee agrees to abstain from the continued use of the substance, provided the leave will not cause the School an undue hardship. If you have any questions relating to this, please contact the Human Resources Department for more information.

The legal use of controlled substances prescribed by a licensed medical physician is permitted so long as it does not impair the employee's ability to perform the essential functions of the job and does not endanger coworkers or students at the School.

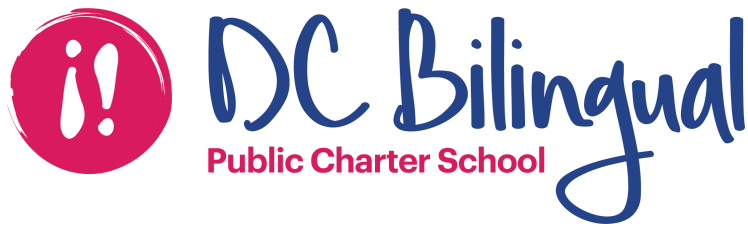
All active employees may be required to submit urine, blood, hair or breathe alcohol specimen to determine the presence of alcohol or drugs in the following instances:

- As a condition to employment, in compliance with the Omnibus Transportation Employee Testing Act of 1991, for "safety-sensitive" positions, such as commercial drivers
- Whenever an employee is involved in an accident, resulting in injury or damage to school property, while on duty
- Whenever cause exists to reasonably suspect that an employee's health or ability to perform his or her work may be impaired based upon behavior, observations, or other sufficient evidence.



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- When an employee is observed using or possessing alcohol or other drugs while at work.
- Any other circumstances that give the School reasonable cause to believe an employee may be using drugs or alcohol at work or have the presence of alcohol or other drugs in the body.

Employees refusing to submit to a test, or testing positive for drugs and/or alcohol, will be subject to disciplinary action, up to and including termination. An employee who tests positive for drugs and/or alcohol has the right to appeal the results and have the original re-tested at his/her expense.

Investigations

The School is committed to ensure the staff and students are safe from harm or conflict. Whenever a manager or Administration team members receives a complaint or allegation of a policy or law, the School will complete an internal investigation. The HR Department will have primary responsibility for investigating complaints relating to any employee misconduct.

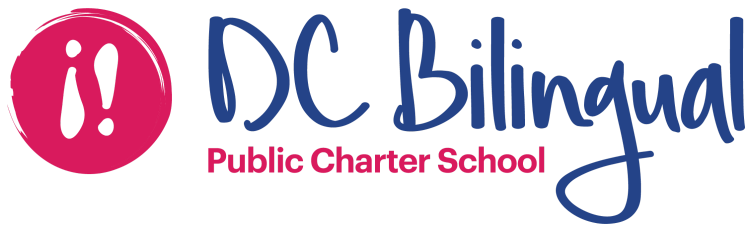
The following list, while not all-inclusive, provides examples of the types of situations that the School will investigate:

- Alleged conduct that potentially deprives an employee or third party (i.e., family, persons or entities desiring to engage in business with the School) of rights because of race, color, religion, sex, sexual orientation, national origin, age, disability, marital status or other characteristics protected by law.
- Alleged verbal or physical conduct that potentially denigrates or shows hostile feelings toward any individual because of race, color, religion, sex, sexual orientation, national origin, age, disability, marital status or other characteristics protected by law. This includes conduct that has the purpose or effect of any of the following:
 - Creating an intimidating, hostile or offensive work environment.
 - Unreasonably interfering with an employee's work performance.
 - Affecting an individual's employment opportunity at the School.
- Alleged conduct or intentional behavior that potentially violates School policy or affects the safety or well-being of fellow employees, visitors, operations or other school-related activities. Such conduct includes threatening communication, physical injury or potential physical harm to another, aggressive or hostile action, intentional damage to company property, and possession of any weapon, regardless of government licensing.
- Allegations relating to student abuse and neglect
- Conduct that violates the School's rules, policies or standards of conduct or the law.



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The HR Department may obtain verbal and written statements to anyone involved, including any first-hand witnesses. Once all interviews are completed, all findings will be given to the Administration Team to make the final decision on any disciplinary action or corrective action.

The School prohibits retaliation including making threatening communication by verbal, written or electronic means against any individual who reports or provides any information concerning unlawful discrimination, harassment or other violations of company policies, rules and standards of conduct. Any employee found to be engaging in retaliation will be subject to disciplinary action up to and including termination.

Whistleblower Policy

This policy is intended to encourage and enable all employees, and others, to raise serious concerns within DCBPCS prior to seeking resolution outside of the School. No director, officer, or employee who, in good faith, reports a violation shall experience harassment, retaliation, or adverse employment consequences. An employee who retaliates against someone, who reports a violation in good faith, is subject to disciplinary action, up to and including termination.

If you are uncomfortable speaking with an immediate supervisor/manager, or are not satisfied with the supervisor/manager's response, please speak with someone in the Administration with whom you feel comfortable speaking with. Supervisors and managers are required to report suspected violations of the Code of Conduct to the Head of School who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when employees are not satisfied or uncomfortable with speaking with any employee of the School, he/she should contact one of the Board Members for DCBPCS.

If anyone files a complaint concerning a suspected violation, or a violation of the Code, must be acting in good faith and must have reasonable grounds for believing the disclosed information designates a violation of the Code. Any allegations which are not substantiated, and which prove to have been made with malicious intent or made knowing the accusation is false, will be subject to disciplinary action, up to and including termination.

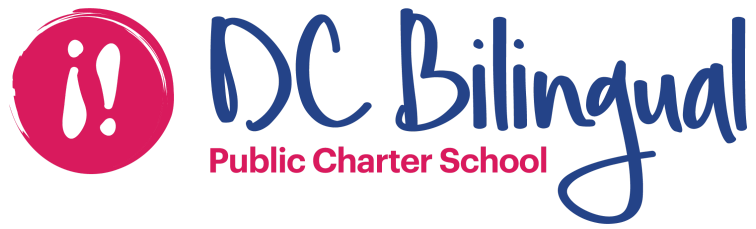
Violations, or suspected violations, may be confidentially submitted by the employee or may be submitted anonymously. These reports will be kept confidential to the extent possible consistent with the need to investigate the report.



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33 Riggs Road, NE, Washington, DC 20011 | (202) 750-6674 (O) | (202) 750-6733 (F)
www.dcbilingual.org | info@dcbilingual.org



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