

Friendship PCS Employee Policies

#1 HARASSMENT/SEXUAL HARRASSMENT

NON-HARASSMENT POLICY

It is FPCS's policy that all team members should be able to enjoy a work environment that is free of discrimination and harassment. This requires that each team member treat with courtesy and respect every other team member and individual with whom the team member has contact in the course of their employment with FPCS. FPCS strictly forbids discrimination or harassment of any kind, including discrimination based on race, color, religion, sex (including pregnancy, childbirth, related medical conditions, breastfeeding or reproductive health decisions), gender identity or expression, national origin, age, marital status, physical or mental disability, sexual orientation, personal appearance, genetic information, family responsibilities, matriculation, political affiliation, military or veteran status, or any other category protected under applicable federal, state, or local law. This policy extends to each and every level of our operation.

Accordingly, any form of harassment, whether by a fellow team member, manager, supervisor, or by a third party doing business with FPCS, will not be tolerated. Prohibited harassment is verbal or physical conduct that denigrates or shows hostility to an individual based on one of the protected categories specified above. However, an individual need not be the target of the harassment (or a part of the group that is being targeted by the harassing conduct) to be offended or injured by the harassing behavior.

Acts that may constitute prohibited harassment include, but are not limited to:

- Jokes;
- Verbal abuse and epithets;
- Slurs or derogatory comments;
- The display of offensive objects and pictures;
- Negative stereotyping
- Intimidation or threats;
- Assault or any physical interference with the team member's normal work or movement;
- Other conduct that the individual may find offensive.

Harassment may also include written or graphic material placed on walls, bulletin boards or elsewhere on FPCS 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 policy includes conduct in any form including but not limited to email, voicemail, social media, internet use or history, text message, pictures, images, writings, words or gestures. Individuals who violate this policy shall be subject to disciplinary action up to and including termination.

If a team member believes they have been the subject of discrimination or harassment or that they have witnessed it in the workplace, the team member should immediately bring concerns to the attention of their supervisor, Human Resources, or any member of management with whom the team member is comfortable.

POLICY AGAINST SEXUAL HARASSMENT

FPCS's policy is to provide its team members with a work environment free from harassment, which includes but is not limited to, harassment on the basis of sex. Sexual harassment is a form of sex discrimination that FPCS will not tolerate and is against the law. It is illegal and strictly against FPCS policy for any team member to harass another team member by making or subjecting any person to unwelcome sexual advances or unwelcome requests for sexual favors, or to engage in any unwelcome or other verbal or non-verbal or physical conduct of a sexual nature that is persistent and offensive, including but not limited to:

- Verbal Harassment (e.g., verbal comments or propositions of a sexual nature);
- Physical Harassment (e.g., physical contact of a sexual nature); or,
- Visual Harassment (e.g., the display or circulation of sexually suggestive or printed material such as posters, cartoons, e-mails or drawings of a sexual nature).

Every team member is expected to be aware of this policy and the types of conduct that may constitute unlawful harassment. This policy extends to each and every level of FPCS operations. Accordingly, sexual harassment, whether by a fellow team member, manager, or non-team member doing business with FPCS (whether of the same sex or the opposite sex), will not be tolerated. In furtherance of FPCS's policy to provide each team member with a work environment free from harassment, FPCS requires that each of its supervisors be responsible for the prevention and elimination of all forms of harassment within their respective departments.

Acts that are considered to constitute sexual harassment include, but are not limited to, unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature where:

- Submission to such conduct is either an express or implied term or condition of employment;
- Submission to or rejection of such conduct is used as a basis for an employment decision affecting the harassed person;
- The purpose of such conduct is to substantially interfere with the affected individual's work performance, or to create an intimidating, hostile, or offensive work environment; or
- The effect of such conduct is to substantially interfere with the affected individual's work performance or create an intimidating, hostile, or offensive work environment.

Examples of conduct that, if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances, including the severity of the conduct and its pervasiveness, include:

- Direct or implied requests by a manager for sexual favors in exchange for actual or promised job benefits (favorable reviews, promotions, salary increases);
- Touching any part of another team member's body;
- Derogatory or provoking remarks about or relating to a team member's gender, sexual orientation, or sexual activity;
- Displaying or transmitting sexually suggestive materials or using sexually explicit language or gestures;
- Continuing to ask a team member to socialize on or off duty when that person has indicated an unwillingness to do so;
- Coerced sexual acts;
- Off-duty conduct which falls within the above definition and affects the work

environment.

The FPCS workplace is not limited to our brick and mortar facilities, but includes anywhere a business or school-related function is taking place, including all FPCS sponsored events. Sexual harassment and any unwelcome sexual conduct of any kind may result in disciplinary actions, up to and including termination of employment, regardless of whether or not it is unlawful.

Please note that while this policy is set forth by the Department of Human Resources of promoting a workplace that is free of sexual harassment, the policy is not designed or intended to limit FPCS's authority to discipline or take remedial action for unacceptable workplace conduct, regardless of whether that conduct satisfies the definition of sexual harassment.

Reporting of Harassment

Team members who feel they are being subjected to harassment/sexual harassment are encouraged to report the harassment/sexual harassment promptly, regardless of whether the harassment/sexual harassment is by a fellow team member, or an FPCS outside vendor, consultant, customer, student, or client.

Furthermore, anyone who believes that a team member is harassing/sexual harassing a fellow team member or one of FPCS's outside vendors, consultants, customers, students, or clients should report this immediately to Human Resources, the team member's supervisor or any member of FPCS's management with whom the team member feels comfortable. Individuals who believe they are being subjected to harassing/sexual harassing or retaliatory conduct may also choose to promptly advise the offender that his or her behavior is unwelcome and request that the offensive behavior be discontinued.

Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events. This behavior is unacceptable on company time and/ or using company equipment via email, phone (including voice messages), text messages, tweets, blogs, social networking sites or other means.

To ensure that a team member wishing to report harassment/sexual harassment do not have to report the incident to the person alleged to be the person harassing/sexually harassing the team member, FPCS's policy provides that reports of sexual or other harassment may be made to any of the following, at the team member's choice: the team member's supervisor, Human Resources, or any member of FPCS management with whom the team member feels comfortable or through the FPCS's ERS hotline at (800) 292-2780.

Investigation of Harassment

Sexual harassment and other forms of harassment of any kind serves no legitimate purpose and has a disruptive effect on the team member's ability to perform the team member's job effectively. FPCS takes allegations of harassment very seriously and will actively investigate all complaints. If it is determined that harassment has occurred, FPCS will take the appropriate action against the offending persons, up to and including termination of employment.

It is FPCS's policy that all such matters will be handled with appropriate care and discretion and that a thorough investigation is conducted. When a team member brings a complaint to the attention of their supervisor, Human Resources will be notified and investigation of the allegations will be undertaken promptly. Such investigations may include, at a minimum, interviews with all persons identified as having a direct and personal knowledge of the incident(s) in question.

LEGAL INFORMATION

Sexual harassment and other forms of harassment described above are unlawful under both federal and state law. FPCS is committed to responding quickly and effectively to any report of harassment and hopes that team members will feel comfortable with coming forward and allowing FPCS to pursue an internal investigation and resolution of the matter. In addition to FPCS's internal complaint procedure, a team member may also pursue a complaint of harassment by contacting the federal and state agencies listed below:

The United States Equal Employment Opportunity Commission ("EEOC")

1400 L Street, NW
Washington, DC 20005
(202) 275-7377

The District of Columbia Office of Human Rights

441 4th Street, NW
Suite 570N
Washington, DC 20001
(202) 727-4559

Both of these agencies may be contacted by team members who wish to file a formal charge of harassment. However, as stated above, FPCS is committed to responding quickly and effectively to any report of harassment and hopes that all team members will feel comfortable coming forward and allowing us to pursue a resolution of the matter internally.

FPCS will not condone or tolerate the harassment/ sexual harassment of its team members by its co-workers, managers or any other individual under our control, or by persons with whom we do business. All team members, regardless of position or title, will be subject to severe discipline, up to and including termination, should the Company determine that the team member is engaged in the harassment/ sexual harassment of another individual.

FALSE COMPLAINTS

A knowingly false complaint of harassment or discrimination may result in disciplinary action up to and including termination of employment.

#2 EQUAL OPPORTUNITY

EQUAL EMPLOYMENT OPPORTUNITY

Equal Employment Opportunity has been, and will continue to be, a fundamental principle at FPCS. FPCS is committed to providing team members with a work environment that is safe, welcoming, and inclusive. This includes ensuring that the work environment is free from unlawful

discrimination. As an equal opportunity employer, FPCS complies with all applicable federal and DC anti-discrimination laws, including Title VII of the Civil Rights Act of 1964, Title IV of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Title II of the American with Disabilities Act of 1990, and the D.C. Human Rights Act of 1977.

FPCS is an equal opportunity employer and follows a policy of administering all employment decisions and personnel actions without regard to race, color, creed, national origin, sex, age, marital status, veteran status, personal appearance, sexual orientation, gender identity or expression, physical or mental disability, genetic disposition or carrier status, pregnancy, childbirth, or related medical conditions, family responsibilities, matriculation, political affiliation, or any other characteristic protected under applicable federal, state, or local law. This policy of non-discrimination applies to but is not limited to the following activities: recruitment and hiring, training, promotion, compensation, benefits, transfer, layoff, termination and all other terms and conditions of employment. Employment decisions at FPCS are based solely upon relevant criteria, including an individual's capabilities, qualifications, training, experience and suitability. FPCS is committed to providing equal employment opportunities to all qualified individuals.

FPCS will not tolerate any unlawful discrimination and prohibits any such conduct. Team members are required to report any situations they believe involve illegal discrimination. Any team members with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their supervisor or the Human Resources Department or any other member of FPCS with whom the team member feels comfortable. Reports also can be made anonymously through the ERS hotline at (800) 292-2780.

Team members can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination or inappropriate conduct will be subject to disciplinary action, up to and including termination of employment.

#3 DRUG AND ALCOHOL-FREE WORKPLACE

DRUG AND ALCOHOL-FREE WORKPLACE

Team members who work while under the influence of drugs or alcohol present a safety hazard to 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 service for our scholars, families stakeholders and external partners. FPCS is committed to maintaining a drug, alcohol and tobacco free environment.

The following conduct is prohibited on FPCS's property, including but not limited to school buildings, grounds, parking lots, garages and fields, along with off-site activities with team members or students and may result in disciplinary actions up to and including termination

- Possession, transfer, sale, distribution, use or solicitation of illegal drugs on FPCS property (including the parking lot and adjacent areas) or during working hours.
- Possession or consumption of alcohol on FPCS property (including adjacent areas) or during working hours. This doesn't not include the authorized use of alcohol at FPCS sponsored functions or activities.

- Possession or use of tobacco products on FPCS property (including the parking lot and adjacent areas) or during working hours.
- Reporting to work, or being present at work, with a detectable amount of any illegal drugs or its metabolites in the team member's body.
- Reporting to work or being present at work being intoxicated or impaired by alcohol or drugs. This does not exclude the authorized use of alcohol at FPCS sponsored functions or activities.
- 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 team member who is taking prescription drugs that may affect the team member's ability to perform the job properly and safely should inform his/her School Leader or Supervisor 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 team member policy, FPCS 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. Team members 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. FPCS will attempt to assist its team members through referrals to rehabilitation, appropriate leaves of absence and other measures, consistent with FPCS policies and applicable federal, safety or DC law. Team members who are struggling with alcohol or drug use concerns are encouraged to contact our free and confidential Team member Assistance Program (888-281-8436).

FPCS further reserves the right to take any and all appropriate and lawful actions necessary to enforce this alcohol, drugs and tobacco free policy including but not limited to , the inspection of FPCS issued lockers, desks or other suspected areas of concealment, as well as team member's personal property when FPCS has reasonable suspicion to believe that the team member has violated this drug, alcohol and tobacco free workplace policy. Furthermore, if there is any reasonable suspicion that a team member has taken illegal drugs, or is on illegal drugs, while on FPCS property, FPCS reserves the right to conduct a drug test. Team members who do not have direct contact with students may be required to submit to a drug or alcohol test based on a job-related reason that is consistent with business necessity.

The results of any urine, blood, or other appropriate test are treated as confidential, with distribution of information limited to those having a strict need to know or right to know as determined by law, and the member of the Human Resources Department or designee.

FPCS makes every reasonable effort to maintain the confidentiality of team member information obtained pursuant to this policy. Such information is disclosed only to those persons having a legitimate need for the information in performing their duties, when a team member has signed a written release for medical records, or otherwise as required by law.

#4 STAFF COMPLAINT RESOLUTION PROCESS

DISCIPLINARY ACTIONS AND DISPUTE RESOLUTION

FPCS may decide in its sole and complete discretion to warn, discipline, suspend or discharge team members with or without progressive disciplinary actions. The appropriate action will depend on the severity of the unsatisfactory performance or behavior, the team member's past performance or the needs of FPCS. As stated, employment at FPCS is at-will and employment may terminate at any time for any reason.

Where progressive discipline is considered to be the appropriate response, FPCS may follow a course of action that may include verbal counseling, followed by a written warning and performance improvement plan that designates action steps to be taken and timing for such action steps. If during the period that a performance improvement plan is in place, job performance/behavior continues to be below standard, the team member may be dismissed from the employ of FPCS, which may be prior to the end of the performance improvement plan period. Progressive discipline does not alter the at-will employment relationship.

If, in the opinion of FPCS, a team member's action(s) or alleged action(s) warrant immediate dismissal or suspension (with or without pay), FPCS reserves the right to act in a manner that it deems appropriate to the situation, without following the disciplinary procedure described above.

FPCS offers team members access to its EAP in the event that such a resource may be helpful in improving the team member's performance/behavior. Refer to the EAP policy for further information.

INTERNAL PROBLEM RESOLUTION

FPCS is committed to providing the best possible working conditions for its team members. Part of this commitment is encouraging an open and frank atmosphere in which any problem, complaint, suggestion, or question receives a timely response from FPCS supervisors and management.

FPCS strives to ensure fair and honest treatment of all team members. Supervisors, managers, and team members are expected to treat each other with mutual respect. Team members are encouraged to offer positive and constructive criticism.

PROBLEM RESOLUTION PROCEDURE

If you disagree with established rules of conduct, policies, or practices, you may express your concern through the problem resolution procedure. No team member will be penalized, formally or informally, for voicing a good faith complaint with FPCS in a reasonable, business-like manner, or for using the problem resolution procedure.

If a situation occurs in which you believe that a condition of employment or a decision affecting you is unjust or inequitable, you are encouraged to make use of the following steps. You may discontinue the procedure at any step. If you believe that you are being discriminated against or harassed, you should follow the steps in the Equal Employment Opportunity policy or Complaint Procedure for Claims of Unlawful Harassment.

- Present your concern to your immediate supervisor or the School Business Manager at your school within five calendar days after an incident occurs. If your supervisor or School

Business Manager is unavailable or if you believe it would be inappropriate to contact that person, you may present the problem to the Director of Human Resources or any other member of management.

- Your supervisor or School Business Manager is to respond to the problem during the initial discussion or within five calendar days, after consulting with appropriate management when necessary. Your supervisor or School Business Manager will document the discussion.
- If you maintain that the problem remains unresolved after discussion, you may present the problem to the Director of Human Resources within five calendar days after the discussion with your supervisor or School Business Manager.
- Human Resources will counsel and provide a resolution to the problem consistent with the supporting facts, applicable policies, precedence, business practices and state and federal law. If the solution provided by Human Resources does not resolve the issue then you will be directed to the COO for further resolution.
- If you are directed to the COO for further resolution, you should present the problem to the COO in writing within five (5) days of your meeting with Human Resources.
- After careful review of the information presented, the COO will inform you of a final decision regarding the problem presented within five calendar days from the date of submission, and will forward a copy of the written response to your file. The COO has full authority to make any adjustment deemed appropriate to resolve the problem.

#5 WHISTLEBLOWER PROTECTION POLICY

WHISTLEBLOWER PROTECTION POLICY

FPCS is committed to lawful and ethical behavior in all of its activities and requires the board, advisors, team members 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.

FPCS is further committed to maintaining a workplace where team members are free to raise concerns regarding the school's business practices, specifically:

1. Reporting suspected violations of law on the part of the school, including but not limited to federal laws and regulations;
2. Providing truthful information in connection with an inquiry or investigation by a court, agency, law enforcement, or other government body; and
3. Identifying potential violations of FPCS policies, specifically the policies contained in its Team member Handbook.

FPCS requires all team members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of FPCS, team members are expected to practice honesty and integrity in fulfilling their responsibilities. This policy is intended to encourage and enable team members to raise serious concerns internally so that FPCS can address and correct inappropriate and unethical conduct and actions.

A whistleblower as defined by this policy is a team member of FPCS who reports an activity that they believe, in good faith, to be illegal or dishonest. The whistleblower is not responsible for investigating any activities or for determining fault. Appropriate administrators are charged with this responsibility and are expected to take corrective measures.

The objectives of the FPCS whistleblower protection policy are to establish policies and procedures to:

- Prevent or detect and correct wrongdoing, including violation of public policies expressed in statutes, regulations, or constitutional provisions;
- Encourage each director, officer, team member and volunteer to report what they in good faith believe to be a material violation of law or policy or questionable accounting or auditing matters by FPCS;
- Ensure the receipt, documentation, retention of records, and resolution of reports received under their policy; and,
- Protect individuals from retaliatory actions.

Reporting Responsibility

Each individual has an obligation to report what he or she believes is a material violation of law policy or any questionable accounting or auditing matter by FPCS it's directors, officers, advisors, team members, volunteers, or other representatives.

If a team member has knowledge of a concern or illegal and/or dishonest fraudulent activity, the team member should contact their supervisor or Human Resources immediately. If the team member is not comfortable with or not satisfied with the response provided, team members are encouraged to speak with the Human Resources Manager or a member of the Chief of Staff Office. Team members may also confidentially report illegal or dishonest behavior by submitting a letter to the attention of the Human Resources Manager.

Anyone reporting a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the conflict of interest policy or of applicable laws and regulations.

The types of concerns that should be reported included but not limited to the following:

- Providing false or misleading information on FPCS financial documents, grant reports, tax returns or other public documents;
- Providing false information to or withholding material information from FPCS's auditors, accountants, lawyers, directors or other representatives responsible for ensuring FPCS compliance with fiscal and legal responsibilities;
- Embezzlement, private benefit, or misappropriation of funds;
- Material violations of FPCS policy, including among others, confidentiality, conflict of interest, whistleblower, ethic and document retentions;

- Discrimination based on any protected class;
- Sexual harassment or abuse;
- Retaliation against a team member who has engaged in protected activity; or,
- Facilitating or concealing any of the above or similar actions.

Although team members are not expected to prove the truth of an allegation, you should be able to demonstrate to the person contacted that the report is being made in good faith. Allegations in bad faith may result in disciplinary action. Additionally, any allegations that prove not to be substantiated and are further proved to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense. An individual who makes allegations that are not substantiated, in good faith, is fully protected by this policy.

Reporting Concerns

Team members

Whenever possible, a team member should seek to resolve concerns by reporting issues directly to their supervisor or to the next level of management as needed until matters are satisfactorily resolved. If for any reason a team member is not comfortable speaking to a supervisor or does not believe the issue is being properly addressed, the team member may contact the Human Resources Department, Chief of Staff, or General Counsel.

Board Members, Advisors, or Other Volunteers

Board members, advisors, and other volunteers may submit concerns to the Chief Executive Officer. If the volunteer, advisor, or board member is not comfortable reporting to the Chief Executive Officer or if they do not believe the issue is being properly addressed, they may report directly to the Chairman of the Board.

Handling of Reported Violations

FPCS will promptly and diligently investigate all reports filed in accordance with this policy. 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 problems. The action taken by FPCS in response to a report of concern under this policy will depend on the nature of the concern. The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the concern.

No Retaliation

This Whistleblower Protection Policy is intended to encourage and enable board members, advisors, team members, and volunteers to raise serious concerns within the organization for investigation and appropriate action. Therefore, no person who, in good faith, reports a concern shall be threatened, discriminated against or otherwise subject to retaliation or, in the case of a

team member, adverse action as a result of such report. Moreover, a volunteer or team member 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 violation of law or policy of accounting or auditing procedures. 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 termination. Depending on the circumstances, such conduct may also give rise to other actions, including civil or criminal lawsuits.

Confidentiality

To the extent practicable, confidentiality will be maintained consistent with the needs to conduct an adequate investigation. This whistleblower protection policy is intended to encourage and enable team members to raise concerns within the organization for investigation and appropriate action. With this goal in mind, no team member who, in good faith, reports a concern shall be subject to retaliation. Moreover, a team member 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. Any whistleblower who believes they are being retaliated against should contact Human Resources immediately.

FPCS will treat all communications under this policy as confidentially as possible, but may need to disclose information for business reasons, including: 1) to conduct a complete and fair investigation or 2) for review of FPCS operations by the Board, independent public accountants, and/or legal counsel.