



Achievement Prep Academy Selected Employee Policies

The Achievement Prep developed the policies contained in this document. We expect each employee to read these policies carefully as they are a valuable reference for understanding your job and Achievement Prep. Achievement Prep reserves the right to revise, delete, and add to the provisions of the policies included herein. However, all such revisions, deletions, or additions must be in writing. By continuing employment after a policy change is announced, employees are agreeing that the policy applies. Furthermore, only the Executive Director (ED) has the authority to enter into an employment agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the ED and/or his or her designee.

Not all of our policies and procedures are set forth in this policies document. We have summarized only the more important ones. If you have any questions or concerns about this document or any other policy or procedure, please contact Human Resources or the ED.

HARASSMENT

Achievement Prep is committed to providing a work environment free of harassment. As a result, we maintain a strict policy prohibiting sexual harassment and harassment against applicants and employees because of the following legally protected characteristics: race, color, age (18 and over), sex (including pregnancy, childbirth or related medical conditions, breastfeeding, and reproductive health decisions), marital status, sexual orientation, disability, national origin or ancestry, religion, personal appearance, gender identity or expression, family responsibilities, matriculation (e.g., being enrolled in a college or university or in a business, nursing, professional, secretarial, technical or vocational school), political affiliation, genetic information (including family medical history), lawful use of tobacco products and unemployment status, or any other characteristic or status protected by federal, state or local laws. All such harassment is prohibited. Sexual harassment may include a range of behaviors and may involve individuals of the same or different gender. While not exhaustive, some examples of sexual harassment are:

- Unwelcome or unwanted sexual advances. This includes, but is not limited to, patting, pinching, brushing up against, hugging, cornering, kissing, fondling, or any other similar physical contact considered unacceptable by another individual.
- Requests or demands for sexual favors. This includes, but is not limited to, subtle or blatant expectations, pressures, or requests for any type of sexual favor accompanied by an implied or stated promise of preferential treatment or negative consequences concerning one's employment.
- Verbal abuse or joking that is sexually oriented and considered unacceptable by another individual. This includes, but is not limited to, comments about an individual's body or appearance (where such comments go beyond a mere compliment); off-color jokes that are clearly unwanted; or any other tasteless, sexually-oriented comments, innuendos, or offensive language.
- Any sexually oriented conduct that would unreasonably interfere with another's work performance. This includes, but is not limited to, extending unwanted sexual attention to someone, which reduces personal productivity.



- Participation in fostering a work environment that is generally intimidating or offensive because of unwelcome or unwanted sexually oriented conversations, suggestions, requests, demands, physical contacts, or attention.

Achievement Prep prohibits any employee, scholar, parent, volunteer, vendor or other visitor from making unwelcome sexual advances of a verbal or physical nature toward an employee or applicant, or unlawfully harassing an employee or applicant.

Prohibited harassment on the basis of the federal and local, legally protected characteristics detailed in section one.

- Verbal conduct including threats, epithets, derogatory comments or slurs.
- Visual conduct including derogatory posters, photography, cartoons, drawings or gestures.
- Physical conduct including assault, unwanted touching or blocking normal movement.
- Retaliation for making harassment reports or threatening to report harassment.

If you feel that an Achievement Prep employee, scholar, parent, vendor, consultant contractor, or other visitor has unlawfully harassed you, or if you observe such conduct, you should report the situation immediately to Human Resources or the ED. Acts of harassment or sexual harassment may continue if they are not reported, and Achievement Prep will be unable to take action to correct the problem if it receives no notice of unwanted, inappropriate behavior.

Upon such notification, Achievement Prep will undertake prompt, thorough and objective investigation and, if warranted, corrective action. Any employee who, after appropriate investigation, Achievement Prep has been found to have harassed or sexually harassed another employee, scholar, parent, consultant, contractor or other visitor will be subject to appropriate disciplinary action up to and including dismissal.

Achievement Prep is committed to providing employees with an environment in which they feel free and safe to report harassment of any kind. It is therefore a violation of Achievement Prep policy to retaliate against anyone for reporting harassment, assisting anyone in reporting harassment, or for participation in an internal or external investigation of harassment. The procedures (and your rights) regarding the reporting of retaliation are the same as for reporting harassment. Any employee whom, after appropriate investigation, Achievement Prep finds to have retaliated against another employee, scholar, parent, consultant, contractor or other visitor for reporting harassment will be subject to appropriate disciplinary action up to and including dismissal.

It is also essential to understand that consenting romantic and sexual relationships between supervisory and subordinate employees, or between coworkers, may lead to unforeseen complications. The respect and trust accorded a more senior/supervisory person by a lower-level staff member, as well as the power held by that person in evaluating or otherwise supervising the lower-level person could diminish the extent to which the lower-level employee actually feels free to choose to engage in a relationship. Therefore, each Achievement Prep employee should be aware of the possible risks of a consensual sexual relationship.

Intimate/romantic relationships between a more senior and more junior-level team member are strictly prohibited at Achievement Prep. If two employees marry, become related (relative), are in or enter into an intimate relationship of any form, they may not remain in a reporting relationship or in positions where one individual may affect the compensation or other terms or conditions of employment of the other individual.



We will attempt to identify an alternative management structure or positions, and the employees will have ten (10) calendar days to decide which individual will remain in his or her current position. If no alternate management structure or position is available, the employees will have thirty (30) days to decide which employee will remain with Achievement Prep. If this decision is not made in the time allowed, we will make the decision. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

EQUAL EMPLOYMENT OPPORTUNITY

Achievement Prep is committed to equal employment opportunity and to compliance with federal antidiscrimination laws. Achievement Prep also complies with the District of Columbia Human Rights Act (DCHRA). In addition to the federally protected classes (race, religion, color, sex, age, national origin, ancestry and disability), the DCHRA prohibits discrimination based on the following factors:

- Race: classification or association based on a person's ancestry or ethnicity
- Color: skin pigmentation or complexion
- Religion: a belief system which may or may not include spirituality
- National origin: the country or area where one's ancestors are from
- Sex: a person's gender; sex discrimination includes sex harassment, and discrimination based on pregnancy, childbirth, related medical conditions, breastfeeding, and reproductive health decisions.
- Age: 18 years or older
- Marital status: married, single, in a domestic partnership, divorced, separated, and widowed
- Personal appearance: outward appearance, but is subject to business requirements or standards
- Sexual orientation: homosexuality, heterosexuality, and bisexuality
- Gender identity or expression: your gender-related identity, behavior, appearance, expression or behavior which is different from what you are assigned at birth
- Family responsibilities: supporting a person in a dependent relationship, which includes, but is not limited to, your children, grandchildren and parents.
- Political affiliation: belonging to or supporting a political party
- Disability: a physical or mental impairment that substantially limits one or more major life activities; includes those with HIV/AIDS.
- Matriculation: being enrolled in a college, university or some type of secondary school.
- Genetic information: Your DNA or family history which may provide information as to a person's predisposition or likely to come down with a disease or illness.
- Credit Information (applies to employment): any written, verbal or other communication of information bearing on an employee's creditworthiness, credit standing, credit capacity or credit history.

Achievement Prep will not tolerate discrimination or harassment based upon these characteristics or any other characteristic protected by applicable federal or local law.



If you feel that you have been denied equal opportunity based on any of the above identified categories, you should report the situation immediately to Human Resources or the ED. In addition, you can use the process set forth in Achievement Prep's Grievance Procedure (Section 4).

Disability Accommodation

To comply with applicable laws ensuring equal employment opportunities to qualified individuals with disabilities, Achievement Prep will make reasonable accommodation for the known physical or mental limitations of an otherwise qualified individual with a disability, who is an employee, unless an accommodation would impose an undue hardship on Achievement Prep and/or the individual poses a direct threat to the health and/or safety of the individual or others in the workplace. Any employee who requires an accommodation to perform the essential functions of his/her job should contact Human Resources and request such an accommodation. The individual with the disability should specify what barriers or limitations make it difficult for him or her to perform the job. Achievement Prep will conduct an investigation regarding these barriers or limitations and will then identify possible accommodations, if any, that will help to eliminate the barrier(s) or limitation(s). The employee is required to fully cooperate with Achievement Prep in seeking and evaluating alternative accommodations. Achievement Prep may require medical verification of both the disability and the need for accommodation.

Employees who wish to request an unpaid leave of absence or who wish to extend a current leave of absence as an accommodation because of a qualifying disability should communicate in writing to Human Resources and provide corroborating documentation.

Pregnancy Accommodation

Employees may request a reasonable accommodation for pregnancy, childbirth or related medical conditions or breastfeeding. A reasonable accommodation will be provided unless the accommodation would impose an undue hardship on Achievement Prep's operations.

Reasonable accommodation may include, but is not limited to: more frequent or longer breaks; time off to recover from childbirth; the acquisition or modification of equipment or seating; the temporary transfer to a less strenuous or hazardous position; other job restructuring, such as light duty or a modified work schedule; avoidance of heavy lifting; relocation of the employee's work area; or the availability of private, non-bathroom space for the expression of breast milk.

Employees who take leave or are provided a temporary transfer as an accommodation under this policy will be reinstated to their original job or to an equivalent position with equivalent pay, accumulated seniority and retirement, benefits and other applicable service credits upon their notification to Achievement Prep of their intent to return to work or when the employee's need for a reasonable accommodation ends.

Achievement Prep may require that employees provide a certification from their health care provider regarding a medical condition that requires an accommodation.

Achievement Prep will not take an adverse employment action against employees who request or are provided a reasonable accommodation in accordance with this policy. Achievement Prep also will not require an



employee to accept an accommodation or require an employee to take leave if a reasonable accommodation can be provided in the workplace.

Employees who have questions about this policy or who wish to request a reasonable accommodation under this policy should contact Human Resources.

Lactation Accommodation

Achievement Prep will provide reasonable daily breaks to accommodate an employee desiring to express breast milk for the employee's child. If possible, nursing mothers should take time to express breast milk during their regular meal and/or rest breaks. If the break time cannot run concurrently with the meal and/or rest breaks already provided to the employee, the break time will be unpaid for nonexempt employees. Where these additional breaks are required, employees should work with their supervisor regarding scheduling.

Achievement Prep will make reasonable efforts to provide employees with the use of a private, secure and sanitary room in close proximity to the work area, other than a bathroom or toilet stall, for employees to express milk. The location may include a childcare facility in close proximity to the employee's work location. Employees should discuss with a Human Resources representative the location to express their breast milk and for storage of expressed milk and to make any other arrangements under this policy. Achievement Prep reserves the right to not provide additional break time or a private location for expressing breast milk if doing so would create an undue hardship for Achievement Prep's operations.

Achievement Prep strictly prohibits discrimination against or harassment of employees because they are breastfeeding mothers and/or request or take breaks in accordance with this policy.

Religious Accommodation

Achievement Prep will attempt to make a reasonable accommodation for employee observances of religious holidays and sincerely held religious beliefs, including time off for religious holidays and accommodations related to dress and grooming practices, unless doing so would cause an undue hardship to school operations. If you desire a religious accommodation, you are required to make the request, in writing, to your supervisor and to Human Resources. Achievement Prep will grant up to two (2) days of PTO for religious holidays and accommodations; any other time off exceeding such two (2) days will require use of accrued leave or be unpaid.

DRUG-FREE WORKPLACE

Achievement Prep has a vital interest in maintaining safe, healthy and efficient working conditions for its employees and scholars. The use or abuse of alcohol or drugs can have a serious adverse effect on quality, safety and productivity. Achievement Prep maintains a drug-free workplace. The consumption of or the possession, sale, use and/or distribution of illegal drugs on our premises, at Achievement Prep-sponsored events, or while conducting Achievement Prep business is prohibited. Offenders will be subject to disciplinary action, up to and including termination of employment.



Achievement Prep recognizes that most substance dependence can be treated successfully. If you feel that you have developed a substance abuse problem, you are encouraged to voluntarily seek help. All voluntary inquiries will be handled confidentially. Failure to follow prescribed medical treatment or to maintain work performance at an acceptable level will be justification for termination on the same basis as any other employee's work performance is unsatisfactory.

The following specific rules have been established to prevent substance abuse at our school, and to encourage employees to seek treatment voluntarily:

1. All employees are prohibited from manufacturing, cultivating, distributing, dispensing, possessing or using illegal drugs at all times. Included within this prohibition are lawful controlled substances that have been illegally or improperly obtained. This policy does not prohibit the possession and proper use of lawfully prescribed drugs taken in accordance with the prescription. The legalization of marijuana in the District of Columbia does not give an employee the right to possess, use or be under the influence of marijuana on Achievement Prep's premises or while representing Achievement Prep off of the premises.
2. Employees are also prohibited from having any such illegal or unauthorized controlled substances in their system while at work.
3. All employees are prohibited from distributing, dispensing, possessing or using any beverage or medicine containing alcohol while at work or on duty and from coming onto school premises, reporting to work, or working with alcohol in their systems. Furthermore, lawful off-duty alcohol use, while generally not prohibited by this policy, must not interfere with an employee's job performance.
4. To help ensure a safe and healthful working environment, job applicants and employees may be asked to provide body substance samples to determine the illicit or illegal use of drugs. Refusal to submit to drug testing will be considered to be a positive result, with disciplinary action, up to and including termination of employment, as a consequence. A positive drug test may also result in disciplinary action up to and including termination from employment. Additionally, job applicants and employees may be asked to cooperate in person and/or facility searches. Refusal to cooperate with these procedures may result in disciplinary action up to and including termination.
5. The proper use of medication prescribed by your physician is not prohibited; however, we do prohibit the misuse of prescribed medication. Employees' drug use may affect their job performance, such as by causing dizziness or drowsiness. It is the employee's responsibility to determine from his/her physician whether a prescribed drug may impair safe job performance and to notify a supervisor of any job restrictions that should be observed as a result. Achievement Prep will comply with all requirements pertaining to providing reasonable accommodations to the extent required by applicable law.
6. Employees who voluntarily seek help for substance abuse (self-referral) will be provided an opportunity to pursue counseling and rehabilitation. Achievement Prep will make available to employees information about counseling and rehabilitation services. An employee who is receiving counseling and/or treatment for substance abuse may use available PTO, personal leave, sick leave, and, if eligible, family and medical leave. Health insurance often covers the costs of such services, but the employee must pay costs not covered. The employee cannot return to work until released by a treatment provider to do so, and he or she receives a negative result on a return-to-work drug and/or alcohol test (as appropriate for that individual). In addition, the employee may be asked to submit to follow-up testing as a condition of reinstatement for a period following the return to work.



7. An employee's decision to seek help voluntarily will not be used as a basis for disciplinary action, although the individual may be transferred, given work restrictions, or placed on leave, as appropriate. A request for help is considered voluntary only if it is made before the employee is asked to submit to a drug or alcohol test or is discovered to have otherwise violated this policy, or Achievement Prep has decided to take disciplinary action due to unsatisfactory job performance and/or inappropriate conduct.

The establishment of this policy in no way diminishes Achievement Prep's right and/or authority to discipline or discharge an employee for conduct that would warrant discipline or discharge if the employee were not chemically or alcohol dependent. Neither the existence of this policy, nor an employee's participation in any recovery program will excuse an employee from following Achievement Prep's rules.

GRIEVANCE PROCEDURE

It is the policy of Achievement Prep that all employees, scholars, parents, and visitors have the right to voice their complaints or grievances about matters pertaining to its schools.

Achievement Prep recognizes the meaningful value and importance of full discussion in resolving misunderstandings and in preserving good relations between management and employees. Accordingly, the following grievance procedure should be employed to ensure that complaints receive full consideration.

What May Be Grieved

The Achievement Prep grievance process should be used as follows: (1) to deal with complaints and concerns pertaining to educational environment, employment arrangements, or interpersonal conflicts; and (2) to resolve complaints of discrimination and harassment based upon race, color, sex, marital status, sexual orientation, disability, national origin or ancestry, religion, personal appearance, gender identity or expression, family responsibilities, matriculation, political affiliation, genetic information, lawful use of tobacco products and unemployment status, or any other characteristic or status protected by federal, state or local laws.

Who May Grieve

The procedures set forth below may be used by grievants who are employees, scholars, parents, or visitors.

Other Remedies

The existence of this procedure does not bar the grievant from also filing claims in other forums to the extent permitted by state or federal law.

Because most difficulties can be resolved by communicating a concern to someone, grievants are encouraged to discuss their concern or harassment complaint promptly and candidly with their immediate supervisor or the school Principal.

The grievant is not required to discuss his or her complaint with the alleged harasser or perpetrator in any manner or for any reason prior to initiating a formal grievance.

Formal Grievance

Within ninety (90) business days of encountering the harassment, discrimination, or complaint that is the subject of the grievance, a grievant shall file a written notice with Human Resources (HR). Grievant may use the Grievance Form, which is available from HR. The written notice shall identify the nature of the complaint, the date(s) of occurrence, and the desired result, and shall be signed and dated by the person filing the grievance. In the event a grievance is being filed by the legal guardian or parent of a scholar, the scholar and the legal guardian and or parent shall sign and date the grievance.

Human Resources will immediately initiate an adequate, reliable, impartial investigation of the grievance. Each formal complaint will be investigated, and depending on the facts involved in each situation, will be decided after receiving information from the appropriate individuals. Each investigation will include interviewing witnesses, obtaining documents, and allowing parties to present evidence.

All documentation related to the investigation and discussions held in this process are considered **EXTREMELY CONFIDENTIAL** and are not to be revealed to or discussed by any participant with persons not directly involved with the complaint, with its investigation, or with the decision-making process. This provision does not include discussions with the governmental authorities.

Within thirty (30) business days of receiving the written notice, Human Resources shall respond in writing to the grievant (the "Response"). The Response shall summarize the course of the investigation, determine the validity of the grievance, and the appropriate resolution.

If, as a result of the investigation, harassment, or a valid grievance is established, appropriate corrective and remedial action will be taken.

Appeals

If the grievant is not satisfied with the Response, the grievant may appeal in writing to the Achievement Prep Legal Department (or designee) within thirty (30) business days of the date of the Response summarizing the outcome of the investigation. The written appeal must contain all written



documentation from the initial grievance and the grievant's reasons for not accepting the Response. The appeal, in letter form, may be sent to: Achievement Prep Legal Department, 908 Wahler Place, SE, Washington, DC 20032.

Within fifteen (15) business days from receiving the written appeal, the Legal Department (or designee) will respond in writing to the appellant as to the action to be taken and the reasons therefore.

Prohibition Against Retaliation

Achievement Prep pledges that it will not retaliate against any person who files a complaint in accordance with this policy, or any person who participates in proceedings related to this policy.

In addition, Achievement Prep will not tolerate any form of retaliation against any person who makes a good faith report or complaint about perceived acts of harassment, discrimination, or concern, or who cooperates in an investigation of harassment, discrimination, or a concern. Any person who is found to be engaging in any kind of retaliation will be subject to appropriate disciplinary action.

Modifications

Achievement Prep may approve modification of the foregoing procedures in a particular case if the modification (a) is for good cause, and (b) does not violate due process rights or policies of Achievement Prep.

WHISTLEBLOWER

Achievement Prep is committed to lawful and ethical behavior in all of its activities and requires the board, advisors, employees 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.

Our whistleblower policy establishes 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, employee and volunteer ("Individual") to report what they in good faith believe to be a material violation of law or policy or questionable accounting or auditing matter by Achievement Prep;

Achievement Prep Network Office



- Ensure the receipt, documentation, retention of records, and resolution of reports received under this policy; and
- Protect Individuals from retaliatory action.

Reporting Responsibility

Each Individual has an obligation to report what they believe is a material violation of law or policy or any questionable accounting or auditing matter by Achievement Prep, its directors, officers, advisors, employees, volunteers, or other representatives. The types of concerns that should be reported include, for purposes of illustration and without being limited to, the following:

- Providing false or misleading information on Achievement Prep's financial documents, grant reports, tax returns or other public documents;
- Providing false information to or withholding material information from Achievement Prep's auditors, accountants, lawyers, directors or other representatives responsible for ensuring Achievement Prep compliance with fiscal and legal responsibilities;
- Embezzlement, private benefit, or misappropriation of funds;
- Material violation of Achievement Prep policy, including among others, confidentiality, conflict of interest, whistleblower, ethics and document retention;
- Discrimination based on any protected class;
- Sexual harassment or abuse;
- Retaliation against an employee who has engaged in protected activity;
- Facilitating or concealing any of the above or similar actions.

Reporting Concerns

Employees: Whenever possible, an employee 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. However, if, for any reason, an employee is not comfortable speaking to a supervisor or does not believe the issue is being properly addressed, the employee may contact People Operations, the Managing Director of Operations or the Executive Director. If an employee does not believe that these channels of communication can or should be used to express their concerns, an employee may contact the chair of the Board of Trustees. Whenever practical, reports should be in writing.

Board Members, Advisors and Other Volunteers: Board members, advisors, and other volunteers may submit concerns to the Executive Director. If the volunteer, advisor, or board member is not comfortable reporting to the Executive Director or if they do not believe the issue is being properly addressed, they may report directly to the chair of the Board.

Handling of Reported Violations

Achievement Prep will promptly investigate all reports filed in accordance with this policy with due care. 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 problem. Achievement

Achievement Prep Network Office



Prep staff will issue a full report of all matters raised under this policy to the Board of Trustees. The Finance Committee of the Board may conduct a further investigation upon receiving the report from the Executive Director. For matters reported directly to the chair of the Board, the Finance Committee shall promptly acknowledge receipt of the complaint to the complainant if the identity of the complainant is known and conduct an investigation to determine if the allegations are true and whether the issue is material and what, if any, corrective action is necessary. Upon the conclusion of this investigation, the Finance Committee shall promptly report its findings to the Achievement Prep Board of Trustees.

Authority of Finance Committee: The Finance Committee shall have full authority to investigate concerns raised in accordance with this policy and may retain outside legal counsel, accountants, or any other resource that the Committee reasonably believes is necessary to conduct a full and complete investigation of the allegations.

No Retaliation: This Whistleblower Policy is intended to encourage and enable board members, advisors, employees and volunteers to raise serious concerns within the organization for investigation and appropriate action. With this goal in mind, no trustee, advisor, employee or volunteer who, in good faith, reports a concern shall be threatened, discriminated against or otherwise subject to retaliation or, in the case of an employee, adverse action as a result of such report. Moreover, a volunteer or employee 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 or 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 dismissal from the volunteer position or termination of employment. Depending on the circumstances, such conduct may also give rise to other actions, including civil or criminal lawsuits.

Confidentiality

Achievement Prep 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 Achievement Prep's operations by Achievement Prep's board, Finance Committee, independent public accountants, and/or legal counsel.