Appendix J: EQUAL EMPLOYMENT OPPORTUNITY POLICY

Purpose

Imagine Schools ("Imagine") is an equal opportunity employer. In keeping with Imagine's three shared values of Integrity, Justice, and Fun, Imagine strives to maintain a working environment free from discrimination for all employees, applicants, and students of Imagine.

Persons Affected

This policy applies to all employees, applicants, and students of Imagine. This policy applies wherever an employee is performing a function of his or her job (e.g., in the workplace or at an offsite meeting).

Policy

As an equal opportunity employer, Imagine is committed to the fair and equal treatment of all employees. It is a fundamental policy of Imagine, its subsidiaries and affiliates, to maintain a workplace that is free from discrimination. Imagine prohibits all forms of discrimination, whether based on race, color, religion, sex, national origin, genetic information, age, disability, veteran status, pregnancy, marital status, sexual orientation, or any other reason prohibited by law. Imagine also prohibits unwelcome and/or inappropriate conduct that is directed at a person because of any of these characteristics.

Unlawful pregnancy discrimination includes discrimination on the basis of pregnancy, childbirth, or related medical conditions. Imagine is committed to treating women affected by pregnancy, childbirth, or related medical conditions the same for all employment-related purposes as other persons not so affected but similar in their ability or inability to work.

All complaints or allegations of discrimination on the basis of a protected characteristic should be reported immediately. Complaints of this nature will be investigated promptly. In the event discrimination in violation of this policy is found to have taken place, appropriate corrective action will be taken, up to and including discharge.

Anti-Discrimination

Imagine will not discriminate in hiring, promotion, training, pay, benefits, or other terms and conditions of employment on the basis of an individual's race, color, religion, sex, national origin, ethnicity, age, disability, military service or status, pregnancy, marital status, sexual orientation, genetic predisposition, or any other reason prohibited by law. Imagine complies with equal opportunity laws and regulations of all applicable government entities. Imagine is committed to administering personnel actions in compliance with such laws and regulations. Employment decisions at Imagine will be based on appropriate job-related factors such individual merit, skills, qualifications, prior job experience, and demonstrated work performance.

Imagine will attempt to provide reasonable accommodations to employees who inform Imagine of known physical or mental impairments that impact major life activities, provided the employee is able to perform the essential functions of his/her position, with or without reasonable accommodation.

Imagine will also attempt to provide reasonable accommodations for religious expression when an employee makes the need known, provided the religious expression is not coercive or demeaning to another individual's sincerely held religious beliefs, or lack of such beliefs.

It is the responsibility of every employee to ensure that discrimination does not occur in the workplace. Employees who experience problems in the area of equal employment opportunity should discuss the matter with their Principal, Regional Director, or a member of the Legal Department.

Complaint Procedures

Employees who believe they are being subjected to discrimination in violation of this policy, or who observe such discrimination of others, should immediately report the incident to their supervisor. If they feel it would be inappropriate to discuss the incident with their supervisor, or if their supervisor is the subject of the complaint, they should contact their principal, Regional Director, or a member of the Legal Department. All reports of alleged discrimination will be investigated promptly and handled, to the extent possible, in a confidential manner. Disclosure regarding such matters will be on a need-to-know basis, consistent with the rights of the persons involved, and with the obligation of Imagine to investigate the allegation and, when necessary, to take prompt appropriate action.

All employees are expected to act reasonably and honestly when they present discrimination allegations. Employees are also expected to cooperate fully with an investigation into discrimination allegations and maintain the confidentiality of investigation information. Intentionally filing false and/or malicious complaints may result in disciplinary action.

Any manager or supervisor who becomes aware of conduct that may violate this policy and fails to report the matter and/or take appropriate action to address such conduct will be subject to disciplinary action, up to and including termination. Appropriate action includes, but is not limited to notifying the manager or supervisor's Principal, Regional Director, or a member of the Legal Department.

Prohibition against Retaliation

Imagine pledges that it will not retaliate against any employee or applicant because that employee or applicant has opposed any practices constituting possible discrimination and/or has participated in any internal, government agency, or court proceeding concerning possible discrimination.

Imagine will not tolerate any form of retaliation against any employee who makes a good faith report or complaint about perceived acts of discrimination, or who cooperates in an investigation of discrimination. All employees have the right to present allegations or participate in an investigation without fear of retaliation. Any employee who is found to be engaging in any kind of retaliation will be subject to appropriate disciplinary action, up to and including termination of employment.

Enforcement

When it is determined that an Imagine employee has engaged in discrimination in violation of this policy, appropriate disciplinary action will be taken, up to and including discharge. Discipline may include counseling, written warning, suspension, transfer, demotion, termination, or any other action deemed appropriate in the circumstances.