Imagine School at Land O Lakes Equity Policy – Non-Instructional Support Staff

Equal Employment Opportunity Statement

Equal Employment Opportunity is a fundamental principle at Imagine Schools, where employment is based upon personal capabilities and qualifications without discrimination because of race, color, religion, sex, sexual orientation, age, national origin, disability, marital status, genetic information, veteran status, gender identification, or any other legally protected characteristic. Religious accommodation extends to dress and standards of grooming, including head covering, facial hair, and religious jewelry.

This policy of Equal Employment Opportunity applies to all policies and procedures relating to recruitment, hiring, compensation, benefits, termination, and all other terms and conditions of employment.

The Imagine Schools' Legal Department has overall responsibility for this policy and maintains reporting and monitoring procedures. Employees' questions or concerns should be referred to the Imagine Schools' Legal Department. Appropriate disciplinary action will be taken against any employee willfully violating this policy. A copy of the Imagine Schools' Equal Employment Opportunity Policy may be found in the Appendix.

Americans with Disabilities Act (ADA) Statement

The Americans with Disabilities Act (ADA) prohibits employers with 15 or more employees from discriminating against applicants and individuals with disabilities and requires providing reasonable accommodations to applicants and employees who are qualified for a job, so that they may apply for a job, perform the essential job functions of the position, and enjoy the same benefits as other employees.

Any accommodation must be medically necessary, effective, reasonable, and not an undue hardship upon Company operations. If an employee cannot be accommodated to perform the duties of the employee's position, the Company will attempt to place the employee in a vacant position for which the employee is qualified. Such a reassignment may be at the employee's current rate of pay or a lower rate of pay if an equivalent position for which the employee is qualified is not available.

Any qualified employee with a disability may meet with his/her supervisor to request and discuss possible means of accommodation. If the Company offers an effective, reasonable accommodation within the employee's medically necessary restrictions and the employee declines the accommodation, employment may be terminated if the employee is unable to perform the essential functions of their job. A copy of the Imagine Schools' Americans with Disabilities Act Policy may be found in the Appendix.

Policy Against Unlawful Harassment, Discrimination and Retaliation

Imagine Schools is committed to providing an environment that is free of unlawful harassment, discrimination and retaliation. In furtherance of this commitment, Imagine Schools strictly prohibits all forms of unlawful discrimination and harassment, including: discrimination or harassment on the basis of race, religion, color, sex, sexual orientation, national origin, ancestry, citizenship status, uniform service member and veteran status, marital status, pregnancy, age, protected medical condition, gender identification, genetic information, mental or physical disability or any other category protected by applicable state or federal law. All employees must complete annual training on anti-bullying/harassment, investigation and reporting processes

Imagine Schools' policy against unlawful harassment, discrimination and retaliation applies to all employees, including supervisors and managers, as well as to all unpaid interns and volunteers. Imagine Schools prohibits managers, supervisors and employees from harassing co-workers, as well as Imagine Schools' students, parents/guardians, vendors, independent contractors, and any other third-party associated with Imagine Schools. Any such harassment will subject an employee to disciplinary action, up to and including immediate termination of employment.

Examples of Prohibited Sexual Harassment: Sexual harassment includes a broad spectrum of conduct including harassment based on sex, gender, gender identity or expression, and sexual orientation. By way of illustration only, and not limitation, some examples of unlawful and unacceptable behavior include:

- Unwanted sexual advances; whether they involve touching or not
- Any type of sexual activity in the workplace
- Offering an employment benefit (such as a raise, promotion or career advancement) in exchange for sexual favors, or threatening an employment detriment (such as termination or demotion) for an employee's failure to engage in sexual activity
- Leering, whistling, brushing against the body, patting, standing too close, sexual gestures, suggestive or insulting comments
- Sexual jokes, displaying or posting sexually suggestive objects, pictures, cartoons or posters
- Verbal sexual advances, propositions, requests or comments
- Sending or posting sexually-related messages, videos or messages via text, instant messaging, or social media
- Use of sexual epithets, written or verbal references to sexual conduct, gossip regarding one's sex life, comments on an individual's body, or comments about an individual's sexual activity, deficiencies, prowess, or sexual orientation
- Physical conduct, such as touching, groping, assault, or blocking movement
- Physical or verbal abuse concerning an individual's gender, gender identity or gender expression
- Verbal abuse concerning a person's characteristics such as pitch of voice, facial hair or the size or shape of a person's body, including remarks that a male is too feminine, or a woman is too masculine
- Inquiries into one's sexual experiences or discussion of one's own sexual activities
- Use of slang nicknames such as "honey", "sweetie", "babe", or "doll"

Other Examples of What Constitutes Prohibited Harassment: In addition to the above listed conduct, Imagine Schools strictly prohibits harassment concerning any other protected characteristic. By way of illustration only, and not limitation, such prohibited harassment includes:

- Racial, ethnic, religious or off-color jokes or slurs, epithets, and any other offensive remarks that are negative or degrading to any employee, student, parent, or vendor
- Jokes based on any protected category identified in this policy, whether written, verbal, or electronic
- Threats, intimidation, and other menacing behavior
- Stating or perpetuating rumors, false statements, or gossip
- Inappropriate verbal, graphic, or physical conduct
- Sending or posting harassing messages, videos or messages via text, instant messaging, or social media
- Other harassing conduct based on one or more of the protected categories identified in this policy
- Anything else that reasonably could be thought by another employee, student, parent, or vendor as causing or contributing to an intimidating, uncomfortable, humiliating, hostile, or offensive workplace

Any employee who engages in harassment will be subject to discipline ranging from constructive counseling, up to and including termination of employment. If you have any questions about what constitutes harassing behavior, ask your immediate supervisor, Principal, Regional Director, or the Imagine Schools' Legal Team.

Reporting of Harassment or Discrimination

Imagine Schools strongly urges the reporting of all incidents of discrimination, harassment, or retaliation, regardless of the offender's identity or position. Individuals who believe they have experienced conduct that they believe is contrary to Imagine Schools' policy or who have concerns about such matters should file their complaints with their immediate supervisor, principal, personnel administrator, regional director, or the Imagine Schools' Legal Department. Individuals should not feel obligated to file their complaints with their immediate supervisor first before bringing the matter to the attention of one of the other Imagine Schools' designated representatives identified above.

The availability of this complaint procedure should not deter individuals who believe they are being subjected to harassing conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it be discontinued.

Grievance Procedures

It is the policy of Imagine Schools that all employees, parents, students, and visitors have the right to voice their complaints, grievances or concerns about matters pertaining to its operations. The Company recognizes the significant value and importance of full discussion in resolving misunderstandings and in preserving good relations among management, employees, parents, students, and visitors.

The Company's Grievance Policy and Procedure (found in the Appendix) describes the process for submitting complaints, for investigating them, and for arriving at resolution. A Notice of Grievance Procedures for Employees shall be posted at each worksite. Also, a Notice of Procedural Safeguards and Grievance Procedures for Parents and Students shall be posted at each school.

Individuals who have questions or concerns about the Grievance Policy should contact their worksite management or the Imagine Schools' Legal Department.

Anti-Retaliation Policy

Imagine Schools is committed to prohibiting retaliation against those who themselves or whose family members report, oppose, or participate in an investigation of alleged unlawful harassment, discrimination, or other wrongdoing in the workplace. By way of example only, participating in such an investigation includes, but is not limited to:

- Filing a complaint with a federal or state enforcement or administrative agency;
- Participating in or cooperating with a federal or state enforcement agency that is conducting an investigation of Imagine Schools regarding alleged unlawful activity;
- Testifying as a party, witness, or accused regarding alleged unlawful activity;
- Making or filing an internal complaint with Imagine Schools regarding alleged unlawful activity;
- Providing notice to Imagine Schools regarding alleged unlawful activity;
- Assisting another employee who is engaged in any of these activities.

Imagine Schools is further committed to prohibiting retaliation against qualified employees who request a reasonable accommodation for any known physical or mental disability and employees who request a reasonable accommodation of their religious beliefs and observances.

Workplace Bullying

Imagine Schools considers workplace bullying unacceptable and will not tolerate it under any circumstances. This policy shall apply to all employees, regardless of his or her employee status (i.e. managerial vs. hourly, full-time vs. part-time). Any employee found in violation of this policy will be disciplined, up to and including termination of employment.

Imagine Schools defines bullying as persistent, malicious, unwelcome, severe and pervasive mistreatment that harms, intimidates, offends, degrades or humiliates an employee, whether verbal, physical or otherwise, at the place of work and/or in the course of employment.

Imagine Schools promotes a healthy workplace culture where all employees are able to work in an environment free of bullying behavior.

Imagine Schools encourages all employees to report any instance of bullying behavior. Any reports of this type will be treated seriously, investigated promptly and impartially. Imagine Schools further encourages all employees to formally report any concerns of assault, battery, or other bullying behavior of a criminal nature to the local Police Department. No adverse action will be taken against anyone who reports bullying in good faith.

The Company considers the following types of behavior examples of bullying. Please note, this list is not meant to be exhaustive and is only offered by way of example.

- **Verbal Bullying**: Slandering, ridiculing or maligning a person or his/her family; persistent name calling that is hurtful, insulting, or humiliating; using a person as the butt of jokes; abusive and offensive remarks
- **Physical Bullying**: Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault; damage to a person's work area or property
- **Gesture Bullying**: Nonverbal threatening gestures or glances that convey threatening messages
- **Exclusion**: Socially or physically excluding or disregarding a person in work-related activities
- **Cyber Bullying and Use of Electronic Media Devices**: harassing, threatening or tormenting using digital technology

Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of bullying. Therefore, while no fixed reporting period has been established, Imagine Schools strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken. Imagine Schools will make every effort to stop alleged workplace bullying before it becomes severe or pervasive, but can only do so with the cooperation of its employees.

Any employee who believes he or she has experienced conduct that violates this policy, or who has concerns about such matters, should report his or her complaints verbally or in writing to his or her supervisor, the Personnel Administrator or the Legal Department. Individuals should not feel obligated to report their complaints to their immediate supervisor first before bringing the matter to the attention of one of the other designated representatives identified above.

The availability of this complaint procedure should not deter individuals who believe they are being subjected to bullying conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that such behavior immediately cease. A copy of the Imagine Schools Anti-Bullying Policy may be found in the Appendix.

Appendix - ANTI-HARASSMENT POLICY

Imagine Schools does not and will not tolerate harassment of our employees, applicants, students, parents, vendors or customers. The term "harassment" includes, but is not limited to, slurs, jokes, and other verbal, graphic or physical conduct relating to an individual's race, color, sex/gender, religion, age, marital status, national origin, disability and any other categories protected by state and local law. "Harassment" also includes sexual advances, requests for sexual favors, offensive touching, and other verbal, graphic or physical conduct of a sexual nature. All employees must complete annual training on anti-bullying/harassment, investigation and reporting processes

VIOLATION OF THIS POLICY WILL SUBJECT AN EMPLOYEE TO DISCIPLINARY ACTION UP TO, AND INCLUDING, IMMEDIATE DISCHARGE.

If you feel you are being harassed in any way by a coworker, parent, student, or by an employee of a customer or vendor, you should notify your Manager or Principal immediately. In addition, if you believe that a student is being harassed in any way by an employee, parent, student, or by an employee of a customer or vendor, you should notify your Manager or Principal immediately. Any such matter will be thoroughly investigated, and where appropriate, disciplinary action will be taken.

You should also be aware that no member of management is authorized to make any employment decision based in any way on an employee's submission to or rejection of sexual conduct or advances. No manager or other member of management has the authority to suggest to any employee that the employee's continued employment or future advancement will be affected in any way because the employee enters into or refuses to enter into any form of sexual or other personal relationship with a member of management. No member of management may coerce an employee into a sexual relationship and then reward the employee. No manager may take disciplinary action against an employee or deny a promotion, transfer, award, etc. to an employee because he or she has rejected sexual advances.

In addition, no faculty member or other employee is authorized to make any academic or disciplinary decision based in any way on a student's submission to or rejection of sexual conduct or advances. No faculty member or other employee has the authority to suggest to any student that the student's continued attendance or future advancement will be affected in any way because the student enters into or refuses to enter into a form of sexual or other personal relationship with the faculty member or other employee. No faculty member or other employee may coerce a student into a sexual relationship and then reward the student. No faculty member or other employee may take disciplinary action against a student or deny a promotion, award, grade, or benefit to a student because he or she has rejected sexual advances.

If you feel that you are being harassed, you should tell that individual how you feel. We also ask that you report the matter to your Supervisor or Principal so that we can ensure that the conduct is stopped.If you believe that a manager, member of management, or other employee has acted inconsistently withthis policy, if you are not comfortable bringing a complaint regarding harassment to your immediate manager or if you believe that your complaint concerning a coworker, parent, or an employee of a

customer or vendor has not been handled to your satisfaction, please immediately contact the Senior Vice President of your region and arrange for a meeting to discuss your complaint.

YOU WILL NOT BE PENALIZED IN ANY WAY FOR REPORTING IMPROPER CONDUCT.

It is your responsibility to bring your complaints and concerns to our attention so that we can take whatever steps are necessary to resolve them.

Appendix: GRIEVANCE POLICY AND PROCEDURE – Appendix

It is the policy of Imagine Schools that all employees have the right to voice their complaints.

Imagine 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 Imagine Schools 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, religion, creed, sex, national origin, age, disability, veteran status or sexual orientation, or otherwise.

Who May Grieve

The procedures set forth below may be used by a "grievant" who is a student, teacher, other employee, parent, or visitor making a complaint under this Policy.

Other Remedies

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

Informal Grievance

Because most difficulties can be resolved by communicating a concern to someone, grievants are encouraged to informally discuss their concern or harassment complaint promptly and candidly with the school principal or with the Imagine Regional Director.

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 an informal grievance.

Formal Grievance

The grievant is not required to use the informal grievance process before filing a formal grievance.

Within ninety (90) days of learning of the harassment, discrimination, or complaint that is the subject of the grievance, a grievant shall file a formal grievance (i.e. written complaint) with the school principal or with the Regional Director. A grievant may use the Grievance Form, which is available online from the school website, or the Imagine intranet (for employees only) or from the school principal or the Regional Director. The grievance 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 it. In the event a grievance is being filed

by the legal guardian or parent of a student, the student and the legal guardian and/or parent shall sign and date the grievance. **The grievance may be given by the grievant to the principal or the Regional Director (see contact information provided below).**

Principal: Aimee Williams – aimee.williams@imagineschools.org – 813-428-7444

Regional Director: Stefanie Lowery – Stefanie.lowery@imagineschools.org

The Principal or Regional Director 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 relevant documents and information.

All documentation related to the investigation and discussions held in this process are considered EXTREMELY CONFIDENTIAL and are intended to be maintained for the investigative file. While every effort will be made by the investigator to maintain confidences, governmental authorities could compel disclosure as could other circumstances.

Within thirty (30) business days of receiving the written notice, the Principal or Regional Director 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 Imagine Legal Department (or designee) within thirty (30) 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 the appeal. The appeal, in letter form, may be sent to: Imagine Legal Department, 1900 Gallows Rd., Vienna, Virginia 22182.

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

Prohibition Against Retaliation

Imagine 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, Imagine 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.

Modification

Imagine 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 Imagine.

Appendix: ANTI-BULLYING POLICY

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Imagine Schools promotes a healthy workplace culture where all employees are able to work in an environment free of bullying behavior.

Imagine Schools encourages all employees to report any instance of bullying behavior. Any reports of this type will be treated seriously, investigated promptly and impartially. Imagine Schools further encourages all employees to formally report any concerns of assault, battery, or other bullying behavior of a criminal nature to the local Police Department. Imagine Schools requires any supervisor who witnesses any bullying, irrespective of reporting relationship, to immediately report this conduct to the Personnel Administrator or the Law Department.

Imagine Schools will protect an employee who reports bullying conduct from retaliation or reprisal.

Imagine Schools considers the following types of behavior to constitute workplace bullying. Please note, this list is not meant to be exhaustive and is only offered by way of example:

- Staring, glaring or other nonverbal demonstrations of hostility
- Exclusion or social isolation
- Excessive monitoring or micro-managing
- Work-related harassment (work-overload, unrealistic deadlines, meaningless tasks)
- Being held to a different standard than the rest of an employee's work group
- Consistent ignoring or interrupting of an employee in front of co-workers
- Personal attacks (angry outbursts, excessive profanity, or name-calling)
- Encouragement of others to turn against the targeted employee
- Sabotage of a co-worker's work product or undermining of an employee's work performance; Stalking
- Unwelcome touching or unconsented-to touching; Invasion of another's person's personal space
- Unreasonable interference with an employee's ability to do his or her work (i.e., overloading of emails)
- Repeated infliction of verbal abuse, such as the use of derogatory remarks, insults and epithets
- Conduct that a reasonable person would find hostile, offensive, and unrelated to the employer's

legitimate business interests

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perceived incidents of bullying. Therefore, while no fixed reporting period has been established, Imagine Schools strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken. Imagine Schools will make every effort to stop alleged workplace bullying before it becomes severe or pervasive, but can only do so with the cooperation of its employees.

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The availability of this complaint procedure should not deter individuals who believe they are being subjected to bullying conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that such behavior cease immediately.

Equity Manager - Students
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