

Policy Prohibiting Unlawful Harassment, Discrimination, and Retaliation

RPS is committed to providing a work and educational atmosphere that is free of unlawful harassment, discrimination, and retaliation. RPS's policy prohibits unlawful harassment, discrimination, and retaliation based upon: race (including traits historically associated with race, such as hair texture and hairstyle, including but not limited to braids, locks, and twists); color; gender (including gender identity and gender expression, and transgender identity, whether or not the employee is transitioning or has transitioned); sex (including pregnancy, childbirth, breastfeeding, and related medical conditions); sex stereotype (including an assumption about a person's appearance or behavior, gender roles, gender expression, or gender identity, or about an individual's ability or inability to perform certain kinds of work based on a myth, social expectation, or generalization about the individual's sex); religious creed (including religious dress and grooming practices); marital/registered domestic partner status; age (forty (40) and over); national origin or ancestry (including native language spoken and possession of a driver's license issued to persons unable to prove their presence in the U.S. is authorized by federal law); physical or mental disability (including HIV and AIDS); medical condition (including cancer and genetic characteristics); taking a leave of absence authorized by law; genetic information; sexual orientation; military and veteran status; or any other consideration made unlawful by federal, state, or local laws.

Employees, volunteers, unpaid interns, individuals in apprenticeship programs, Board members, and independent contractors shall not be harassed, or discriminated or retaliated against, based upon the characteristics noted above. The victim does not have to be the person harassed, but can be anyone affected by the offensive conduct.

Discrimination or harassment becomes potentially unlawful where:

1. Enduring the offensive conduct becomes a condition of continued employment; or
2. The conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

Prohibited unlawful harassment and offensive conduct can include but are not limited to:

- Verbal conduct such as epithets, derogatory jokes or comments or slurs;
- Physical conduct including assault, unwanted touching, intimidation, intentionally blocking normal movement, or interfering with work because of sex, race or any other protected basis;
- Ridicule or mockery, insults, or put-downs
- Display of graffiti or printed material promoting racial, ethnic or other stereotypes
- Retaliation for reporting or threatening to report harassment; or
- Disparate treatment based on any of the protected classes above.

Petty slights, annoyances, and isolated incidents (unless extremely serious) will not rise to the level of prohibited discrimination or harassment. To be unlawful, the conduct must create a work environment that would be intimidating, hostile, or offensive to reasonable people.

RPS does not condone and will not tolerate unlawful harassment, discrimination, or retaliation on the part of any employee (including supervisors and managers) or third party (including independent contractors or other person with which the School does business).

Employees who believe they are being harassed or discriminated against are requested to take the following actions:

- In the event you feel you are a victim of harassment, you should immediately contact your immediate supervisor and/or the Human Resources Department through the HR Ticketing system or by emailing compliance@rsed.org. In the event your immediate supervisor is the alleged harasser, you should contact the next level of management.
- Any employees who are uncomfortable with face-to-face interaction may write down their complaints in a memo, and submit the memo to their immediate supervisor and/or the designated Compliance Coordinator.
- Any RPS employee who receives a report of suspected harassment or discrimination is expected to immediately contact the designated Compliance Coordinator.

Reports of prohibited conduct shall be made as soon as possible after the alleged act or knowledge of the alleged act. A failure to promptly report may impair RPS's ability to investigate and address the prohibited conduct. Any supervisor who receives a report of discrimination or harassment shall immediately notify Human Resources.

After receiving a report, the Human Resources Department shall determine whether the allegations, if proven, would constitute prohibited discrimination or harassment. If so, RPS shall immediately authorize or undertake an investigation. If appropriate, RPS shall promptly take interim action calculated to prevent prohibited conduct during the course of an investigation.

The investigation may consist of personal interviews with the person making the report, the person against whom the report is filed, and others with knowledge of the circumstances surrounding the allegations. The investigation may also include analysis of other information or documents related to the allegations. If the results of an investigation indicate that prohibited conduct occurred, RPS shall promptly respond by taking appropriate disciplinary or corrective action reasonably calculated to address the conduct. RPS may also take action based on the results of an investigation, even if the conduct did not rise to the level of prohibited or unlawful conduct.

The investigation will be handled in as confidential a manner as possible, although complete confidentiality cannot be guaranteed. Complainants and witnesses shall not be subject to retaliation for making complaints in good faith or participating in an investigation. Employees who take part in any retaliatory action will be subject to discipline, up to and including termination. Retaliation may include, but is not limited to: demotion, denial of promotion, poor performance appraisals, transfer, and assignment of demeaning tasks or taking any kind of adverse actions against a person who complains about discrimination or harassment. An employee who intentionally makes a false claim, offers false statements, or refuses to cooperate with a RPS investigation regarding harassment or discrimination is subject to appropriate discipline, up to and including termination. RPS is committed to remediating any instances where investigation findings demonstrate unlawful harassment, discrimination, or retaliation has occurred.

Prohibited Unlawful Sexual Harassment

RPS is committed to providing a workplace free of sexual harassment and considers such harassment to be a major offense, which may result in disciplinary action, up to, and including dismissal, of the offending employee.

Sexual harassment consists of sexual advances, request for sexual favors and other verbal or physical conduct of a sexual nature, regardless of whether or not the conduct is motivated by sexual desire, when: (1) submission to the conduct is either made explicitly or implicitly a term or condition of an individual's employment; (2) an employment decision is based upon an individual's acceptance or rejection of that conduct; and/or (3) that conduct interferes with an individual's

work performance or creates an intimidating, hostile or offensive working environment.

It is also unlawful to retaliate in any way against an employee who has articulated a good faith concern about sexual harassment against them or against another individual.

All staff will receive sexual harassment prevention training that they must complete prior to their start date as well as every summer. Such training will address all legally required topics, including information about the negative effects that abusive conduct has on both the victim of the conduct and others in the workplace, as well as methods to prevent abusive conduct undertaken with malice a reasonable person would find hostile, offensive, and unrelated to an employer's legitimate business interests. Abusive conduct includes but is not limited to repeated infliction of verbal abuse, such as the use of derogatory remarks, insults, and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the gratuitous sabotage or undermining of a person's work performance. Supervisors shall also be trained on how to appropriately respond when the supervisor becomes aware that an employee is the target of unlawful harassment. Other staff will receive sexual harassment prevention training as required by law.

Each employee has the responsibility to maintain a workplace free from any form of sexual harassment. Consequently, should any individual, in particular those with supervisory responsibilities, become aware of any conduct that may constitute sexual harassment or other prohibited behavior, immediate action should be taken to address such conduct. Any employee who believes they have been sexually harassed or has witnessed sexual harassment is encouraged to immediately report such harassment to the Human Resources Department.

Sexual harassment may include, but is not limited to:

- Physical assaults of a sexual nature, such as:
 - Rape, sexual battery, molestation or attempts to commit these assaults and
 - Intentional physical conduct that is sexual in nature, such as touching, pinching, patting, grabbing, brushing against another's body, or poking another's body.
- Unwanted sexual advances, propositions or other sexual comments, such as:
 - Sexually oriented gestures, notices, remarks, jokes, or comments about a person's sexuality or sexual experience.
 - Preferential treatment or promises of preferential treatment to an employee for submitting to sexual conduct, including soliciting or attempting to solicit any employee to engage in sexual activity for compensation or reward or disparate treatment for rejecting sexual conduct.
 - Subjecting or threats of subjecting an employee to unwelcome sexual attention or conduct or intentionally making performance of the employee's job more difficult because of the employee's sex.
- Sexual or discriminatory displays or publications anywhere at the workplace by employees, such as:
 - Displaying pictures, cartoons, posters, calendars, graffiti, objections, promotional materials, reading materials, or other materials that are sexually suggestive,

sexually demeaning or pornographic or bringing to work or possessing any such material to read, display or view at work;

- Reading publicly or otherwise publicizing in the work environment materials that are in any way sexually revealing, sexually suggestive, sexually demeaning or pornographic; and
- Displaying signs or other materials purporting to segregate an employee by sex in an area of the workplace (other than restrooms or similar rooms).

The illustrations of harassment and sexual harassment above are not to be construed as an all-inclusive list of prohibited acts under this policy. Moreover, please note that while in most situations a personal relationship is a private matter, these relationships are not appropriate in a professional setting, particularly where one of the parties has management or supervisory responsibilities. As such, consensual relationships in the workplace may violate RPS policy.

Application of Title IX

Sexual harassment is illegal and violates Title IX. As such, any employee who experiences sexual discrimination or harassment should bring the concern to the attention of the Title IX Coordinator:

Director, Human Resources Business Partners
Rocketship Public Schools
11 Plus Park Blvd, Suite 130
Nashville, TN 37217
citaylor@rsed.org

In addition, the Equal Employment Opportunity Commission (EEOC) is an additional resource for employment discrimination claims:

EEOC Headquarters
131 M. Street, N.E.
Washington, DC 20507
202-663-4900
info@eoc.gov

Additional regional agency resources include:

DC Office of Human Rights 441 4th Street NW, Suite 570 North, Washington, DC 20001 Phone: (202) 727-4559 Fax: (202) 727-9589 TTY: 711

Student Discrimination and Harassment

Discrimination and harassment of students by employees are forms of discrimination and are prohibited by law. Employees who suspect a student may have experienced prohibited harassment are obligated to report their concerns to the Principal or other appropriate RPS official. All

allegations of prohibited harassment of a student by an employee or adult will be promptly investigated. An employee who knows of or suspects child abuse or neglect must also report his or her knowledge or suspicion to the appropriate authorities, as required by law.

RPS shall take appropriate disciplinary action against employees who have engaged in discrimination or harassment of students, up to and including termination of employment.

Retaliation against anyone involved in the complaint process is a violation of RPS policy and acts of retaliation may result in disciplinary action, up to and including termination.

Sexual Harassment of Students

Sexual harassment of students includes any unwelcome verbal or physical sexual advances, including but not limited to engaging in sexually oriented conversations; making comments about a student's potential sexual performance; requesting details of a student's sexual history; requesting a date, sexual contact, or any activity intended for the sexual gratification of the employee; engaging in conversations regarding the sexual problems, preferences, or fantasies of either party; inappropriate hugging, kissing, or excessive touching; suggestions that a romantic relationship is desired after the student graduates, including post-graduation plans for dating or marriage; telephoning or texting students at home or elsewhere to solicit unwelcome social relationships; physical contact that would reasonably be construed as sexual in nature; threatening or enticing students to engage in sexual behavior in exchange for grades or other school-related benefit; requests for sexual favors; sexually motivated physical, verbal, or nonverbal conduct when the conduct affects the student's ability to participate in or benefit from a program or activity; or conduct of a sexual nature that creates an intimidating, threatening, hostile or offensive educational environment.

Sexual harassment of students by employees is always a violation of law and will result in appropriate disciplinary action up to and including termination from employment and referral to appropriate law enforcement authorities.

RPS employees are generally encouraged to report an action or suspected action that is illegal or in violation of any adopted Board policy. Good faith reports may be made without fear of reprisal.

Any sexual or romantic relationship between a student and a RPS employee is always prohibited, even if consensual.

Equal Employment Opportunity Is Our Policy

RPS is an equal opportunity employer. It is the policy of the School to afford equal employment and advancement opportunity to all qualified individuals without regard to:

- Race (including traits historically associated with race, such as hair texture and hairstyle, including but not limited to braids, locks, and twists);
- Color;
- Gender (including gender identity, gender expression, and transgender identity, whether or not the employee is transitioning or has transitioned);
- Sex (including pregnancy, childbirth, breastfeeding, and medical conditions related to such);
- Sex stereotype (including an assumption about a person's appearance or behavior, gender roles, gender expression, or gender identity, or about an individual's ability or inability to perform certain kinds of work based on a myth, social expectation, or generalization about the individual's sex);
- Religious creed (including religious dress and grooming practices);
- Marital/registered domestic partner status;
- Age (forty (40) and over);
- National origin or ancestry (including native language spoken and possession of a driver's license issued to persons unable to prove their presence in the U.S. is authorized by federal law);
- Physical or mental disability (including HIV and AIDS);
- Medical condition (including cancer and genetic characteristics);
- Taking of a leave of absence pursuant to the Family Medical Leave Act ("FMLA"), Pregnancy Disability Leave ("PDL") law, Americans with Disabilities Act ("ADA"), or laws related to domestic violence, sexual assault and stalking;
- Genetic information;
- Sexual orientation;
- Military and veteran status; or
- Any other consideration made unlawful by federal, state, or local laws.

Additionally, RPS does not discriminate against an employee or applicant who acts to oppose such discrimination or participates in the investigation of a complaint related to an alleged discriminatory employment practice. Employment decisions will be made on the basis of each individual's job qualifications, experience, and abilities and in accordance with applicable state and federal law.

This policy extends to all job applicants and employees and to all aspects of the employment relationship, including the hiring of new employees and the training, transfer, promotion, discipline, termination, compensation and benefits of existing employees.

To comply with applicable laws ensuring equal employment opportunities to qualified individuals with a disability, RPS will make reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee unless undue hardship would result.

Any applicant or employee who requires an accommodation in order to perform the essential functions of the job should contact RPS and request such an accommodation. The individual with the disability should specify what accommodation he or she needs to perform the job, or if unknown, what job duties the disability impairs. RPS will then conduct an investigation to identify

the barriers that interfere with the equal opportunity of the applicant or employee to perform the job. RPS will identify possible accommodations, if any, that will help eliminate the limitation. If the accommodation is reasonable and will not impose an undue hardship, RPS will make the accommodation.

Employees can raise concerns and make reports without fear of reprisal. Employees with questions or concerns relating to equal employment opportunity, including discrimination and disability accommodations, are encouraged to bring these issues to the attention of a RPS administrator, or the Title VII/Title IX, ADA, or ADEA Coordinator.

As required by Title IX, RPS does not (and is required not to) discriminate on the basis of sex in its educational programs or activities. This non-discrimination requirement applies to admission to and employment with RPS. Inquiries into issues related to Title IX may be referred to RPS's Title IX Coordinator (identified below), to the Assistant Secretary for Civil Rights of the Department of Education, or both.

RPS has designated the following person as the Title IX Coordinator, who is responsible for receiving and overseeing investigations of alleged discrimination on the basis of sex, including sexual harassment: Jade Taylor; Director, HR Business Partner; Rocketship Public Schools; 311 Plus Park Blvd, Suite 130, Nashville, TN 37217; cjtaylor@rsed.org.

RPS has designated the following person as the ADA Coordinator, who is responsible for receiving and investigating complaints of alleged discrimination or harassment on the basis of disability: Jade Taylor; Director, HR Business Partner; Rocketship Public Schools; 311 Plus Park Blvd, Suite 130, Nashville, TN 37217; cjtaylor@rsed.org.

RPS has designated the following person as the Title VII/ADEA Coordinator, who is responsible for receiving and investigating complaints of alleged discrimination or harassment on the basis of age: Jade Taylor; Director, HR Business Partner; Rocketship Public Schools; 311 Plus Park Blvd, Suite 130, Nashville, TN 37217; cjtaylor@rsed.org.

All other complaints regarding equal employment opportunity may be directed to: Jade Taylor; Director, HR Business Partner; Rocketship Public Schools; 311 Plus Park Blvd, Suite 130, Nashville, TN 37217; cjtaylor@rsed.org.

Drug-Free Workplace

Substance Abuse

Rocketship is committed to promoting safety and employee health in the workplace and to creating a work environment that is conducive to attaining high work standards. The use of drugs and alcohol by employees can adversely affect the workplace health, safety, and productivity and can damage public confidence and trust in the School.

To further its interest in avoiding accidents, to promote and maintain safe and efficient working conditions for its employees, and to protect its business, property, equipment, and operations, RPS has established this policy concerning the use of alcohol and drugs. As a condition of continued employment with RPS, each employee must abide by this policy.

Definitions

For purposes of this policy:

- 1) "Illegal drugs or other controlled substances" mean any drug or substance that (a) is not legally obtainable; or (b) is legally obtainable but has not been legally obtained; or (c) has been legally obtained but is being sold or distributed unlawfully.
- 2) "Legal drug" means any drug, including any prescription drug or over-the-counter drug, that has been legally obtained and that is not unlawfully sold or distributed.
- 3) "Abuse of any legal drug" means the use of any legal drug (a) for any purpose other than the purpose for which it was prescribed or manufactured; or (b) in a quantity, frequency, or manner that is contrary to the instructions or recommendations of the prescribing physician or manufacturer.
- 4) "Possession" means that an employee has the substance on his or her person or otherwise under his or her control.
- 5) "Reasonable suspicion" includes a suspicion that is based on specific personal observations such as an employee's manner, disposition, muscular movement, appearance, behavior, speech or breathe odor; information provided to management by an employee, by law enforcement officials, by a security service, or by other persons believed to be reliable; or a suspicion that is based on other surrounding circumstances.

Prohibited Conduct

The prohibitions of this section apply whenever the interests of RPS may be adversely affected, including any time an employee is:

- 1) On RPS premises, except in accordance with RPS's Alcohol on Campus Policy
- 2) Conducting or performing RPS business, regardless of location
- 3) Operating or responsible for the operation, custody, or care of RPS equipment or other property
- 4) Responsible for the safety of others in connection with, or while performing, RPS-related business.

Alcohol: The following acts are prohibited and will subject an employee to discipline, up to and including immediate discharge:

- 1) The unauthorized use, possession, purchase, sale, manufacture, distribution, transportation, or dispensation of alcohol
- 2) Being under the influence of alcohol.

Illegal Drugs: The following acts are prohibited and will subject an employee to discipline, up to and including immediate discharge:

- 1) The use, possession, purchase, sale, manufacture, distribution, transportation, or dispensation of any illegal drug or other controlled substance, including marijuana.
- 2) Being under the influence of any illegal drug or other controlled substance, including marijuana.

Prescription Drugs: This policy prohibits:

- 1) The abuse of any legal drug
- 2) The purchase, sale, manufacture, distribution, transportation, dispensation, or possession of any legal prescription drug in a manner inconsistent with law.
- 3) Working while impaired by the use of a legal drug whenever such impairment might endanger the safety of the employee or some other person, pose a risk of significant damage to RPS property or equipment; or substantially interfere with the employee's job performance or the efficient operation of the RPS's business or equipment.

Nothing in this policy is intended to prohibit the customary and ordinary purchase, sale, use, possession, or dispensation of over-the-counter drugs, so long as that activity does not violate any law or result in an employee being impaired by the use of such drugs in violation of this policy.

Drug Free Awareness Program

RPS has established a Drug-Free Awareness Program that is designed to inform employees about the dangers of drug abuse in the workplace and to help ensure that employees are familiar with this policy and with the disciplinary actions that can result from a violation of this policy. From time to time, employees will be requested to attend one of the sessions of the Drug-Free Awareness Program. During each such session, employees will be given current information about available programs offering counseling and rehabilitation.

Managers and supervisors should be attentive to the performance and conduct of those who work with them and should not permit an employee to work in an impaired condition or to otherwise engage in conduct that violates this policy. When management has reasonable suspicion to believe that an employee or employees are working in violation of this policy, prompt action will be taken.

Drug Testing

- 1) Reasonable Suspicion Testing: If RPS has reasonable suspicion that the employee is working in an impaired condition or otherwise engaging in conduct that violates this policy, the employee will be asked about any observed behavior and offered an opportunity to give a reasonable explanation. If the employee is unable to credibly or adequately explain the behavior, he or she will be asked to take a drug test in accordance with the procedures outlined below. If the employee refuses to cooperate with the administration of the drug test, the refusal will be handled in the same manner as a positive test result.

- 2) **Post-Accident Testing:** Any employee involved in an on-the-job accident or injury under circumstances that suggest possible use or influence of drugs or alcohol in the accident or injury event may be required to submit to a drug and/or alcohol test. This includes not only the employee who was or could have been injured, but also any employee who potentially contributed to the accident or injury event in any way.
- 3) **Procedures for Drug Testing:** RPS will refer the applicant or employee to an independent, National Institute on Drug Abuse (NIDA)-certified medical clinic or laboratory, which will administer the test. RPS will pay the cost of the test and reasonable transportation costs to the testing facility. The employee will have the opportunity to alert the clinic or laboratory personnel to any prescription or non-prescription drugs that he or she has taken that may affect the outcome of the test. All drug testing will be performed by urinalysis. The clinic or laboratory will inform RPS as to whether the applicant passed or failed the drug test. If an employee fails the test, he or she will be considered to be in violation of this policy and will be subject to discipline accordingly.
- 4) **Acknowledgment and Consent:** Any employee subject to testing under this policy will be asked to sign a form acknowledging the procedures governing testing, and consenting to (1) the collection of a urine sample for the purpose of determining the presence of alcohol or drugs, and (2) the release to RPS of medical information regarding the test results. Refusal to sign the agreement and consent form, or to submit to the drug test, will result in the revocation of an applicant's job offer, or will subject an employee to discipline up to and including termination.
- 5) **Confidentiality:** All drug testing-records will be treated as confidential.

Alcohol on Campus

Rocketship strictly prohibits alcohol on school campuses at all times during the instructional school year. This includes times when students are not on campus (i.e. evenings, weekends, or holidays). Alcohol is not to be stored in staff rooms on campus at any time.

However, Rocketship recognizes that schools may encounter rare situations in which it would be appropriate to consume limited amounts of alcohol on campus as part of a social event (i.e., meet-and-greet with community partners).

Alcohol may be permitted on campus in very limited circumstances outside of the instructional school year (i.e., during summer break or before a new campus opens to students), provided that the following circumstances are met:

- Both the Principal and the Human Resources Department provide advance written approval of the event and the list of attendees.
- All alcohol is removed from the campus following the event.
- All staff members act responsibly and professionally and abide by all applicable school and network conduct policies and rules.

Alcohol is not permitted during holiday breaks that fall within the instructional school year, including winter and spring breaks.

If an employee wishes to give another employee alcohol as a gift (i.e., before the holidays or a birthday) during the instructional school year, the exchange must take place off-campus.

Additionally, all Rocketship employees must abide by Rocketship's Substance Abuse Policy.

The Human Resources Department must be promptly notified of any violations of this policy. Rocketship reserves the right to prohibit any School campus from consuming alcohol under any circumstances if the campus is found to have violated this policy or otherwise engaged in conduct that would be deemed inappropriate by a reasonable person in light of the circumstances.

Smoke Free Environment

Rocketship's offices and schools are smoke-free environments. Smoking, including e-cigarettes and vapor products, is not allowed anywhere on a school campus. It is the responsibility of each staff member to adhere to this rule, and to inform all guests of the School's non-smoking policy.

Staff Complaint Resolution

Internal Complaints

(Complaints by Employees Against Employees)

This section of the policy is for use when a school employee raises a complaint or concern about a coworker. If reasonably possible, internal complaints should be resolved at the lowest possible level, including attempts to discuss/resolve concerns with the immediate supervisor. However, in the event an informal resolution may not be achieved or is not appropriate, the following steps will be followed by the Principal or designee:

1. The complainant will bring the matter to the attention of the Principal as soon as possible after attempts to resolve the complaint with the immediate supervisor have failed or if not appropriate
2. The complainant will reduce their complaint to writing, indicating all known and relevant facts. The Principal or designee will then investigate the facts and provide a solution or explanation
3. If the complaint is about the Principal, the complainant may file his or her complaint to the Department of Human Resources through the HR Ticketing system or by emailing compliance@rsed.org. Both are checked every weekday. The HR department may conduct a fact-finding or authorize a third party investigator on behalf of Rocketship. The Department of Human Resources or investigator will report the findings to Rocketship for review and action, if necessary.

This policy cannot guarantee that every problem will be resolved to the employee's satisfaction. However, Rocketship values each employee's ability to express concerns and the need for resolution without fear of adverse consequence to employment.

Policy for Complaints Against Employees

(Complaints by Third Parties Against Employees)

This section of the policy is for use when a non-employee raises a complaint or concern about a school employee. If complaints cannot be resolved informally, complainants may file a written complaint with the Principal or Department of Human Resources by emailing compliance@rsed.org, as soon as possible after the events that give rise to the complainant's concerns. The written complaint should set forth in detail the factual basis for the complaint.

In processing the complaint, the Principal or Department of Human Resources shall abide by the following process:

1. The Principal or Department of Human Resources shall use their best efforts to talk with the parties identified in the complaint and to ascertain the facts relating to the complaint.
2. In the event that the Principal or Department of Human Resources finds that a complaint against an employee is valid, they may take appropriate disciplinary action against the employee. As appropriate, they may also simply counsel/reprimand employees as to their conduct without initiating formal disciplinary measures.
3. The decision relating to the complaint shall be final unless it is appealed to the Board of Directors. The decision of the Board shall be final.

General Requirements

1. **Confidentiality**: All complainants will be notified that information obtained from the complainants and thereafter gathered will be maintained in a manner as confidential as possible, but in some circumstances absolute confidentiality cannot be assured.

2. Non-Retaliation: All complainants will be advised that they will be protected against retaliation as a result of the filing of any complaints or participation in any complaint process.
3. Resolution: Rocketship will investigate complaints appropriately under the circumstances and pursuant to the applicable procedures, and if necessary, take appropriate remedial measures to ensure effective resolution of any complaint.
4. Paid Administrative Leave: Rocketship reserves the right to place any employee on paid administrative leave during an investigation.

Whistleblower Policy

RPS requires its directors, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The purpose of this policy is to encourage and enable employees and volunteers of RPS to report any action or suspected action taken within RPS that is illegal, fraudulent, or in violation of any adopted RPS policy, to a source within RPS before turning to outside parties for resolution. This policy applies to any matter which is related to RPS's business and operations and relates only to those acts of an individual undertaken on behalf of RPS and subject to the direction of RPS. This policy is intended to supplement but not replace RPS's unlawful harassment and discrimination policies, complaint policies, and/or any other RPS employee policy or grievance procedure, or any applicable state and federal laws governing whistleblowing applicable to nonprofit organizations.

Violations: Reporting in Good Faith

All employees and volunteers of RPS are encouraged to report any action or suspected action taken within RSED that is illegal, fraudulent, or in violation of any adopted policy of RPS (each, a "Violation"). Anyone reporting a Violation must act in good faith, without malice to RPS or any individual inside RPS, and have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense that may result in discipline, up to and including termination of employment or volunteer status.

No Retaliation

No employee or volunteer who in good faith reports a Violation or cooperates in the investigation of a Violation shall suffer harassment, retaliation, or adverse employment or volunteer consequences. Any individual within RPS who retaliates against another individual who in good faith has reported a Violation or has cooperated in the investigation of a Violation is subject to discipline, up to and including termination of employment or volunteer status. If an individual believes that someone who has made a report of a Violation or who has cooperated in the investigation of a Violation is suffering from harassment, retaliation or other adverse employment or volunteer consequences, the individual should contact the RPS Compliance Officer. Any individual who reasonably believes he or she has been retaliated against in violation of this policy shall follow the same procedures as for filing a complaint outlined below.

Reporting Process

If an individual reasonably believes that a Violation has occurred, the individual is encouraged to follow the procedures set forth in Rocketship's complaint policies. Reported Violations will be investigated and handled in accordance with Rocketship's complaint policies. Reports may be submitted on a confidential basis by the complainant or may be submitted anonymously by mailing the form to the Compliance Officer at: Rocketship Education, Attn: Compliance Officer, 350 Twin Dolphin Drive, Redwood City, CA 94065 or submitting an email complaint to compliance@rsed.org. The complainant may also report a violation to the Department of Human Resources through the HR Ticketing system.

Confidentiality

RPS encourages anyone reporting a Violation to identify themselves when making a report in order to facilitate the investigation of the Violation. Reports of Violations or suspected Violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, to comply with all applicable laws, and to cooperate with law enforcement authorities. Furthermore, RPS will explore anonymous allegations to the extent possible, but will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances from attributable sources.

Accounting and Auditing Matters

The Business Committee is responsible for addressing reported complaints of Violations relating to corporate accounting practices, internal controls or auditing. The Compliance Officer and any RPS employee in the receipt of such a complaint may elect to report the complaint to the Business Committee.

Confidential Information

All information relating to students, personal information, schools attended, addresses, contact numbers and progress information is confidential in nature, and may not be shared with or distributed to unauthorized parties. All records concerning special education pupils shall be kept strictly confidential and maintained in separate files. Failure to maintain confidentiality may result in disciplinary action, up to and including release from at-will employment.