



Carlos Rosario International Public Charter School

Equal Employment Opportunity at Carlos Rosario School

Carlos Rosario School is committed to the principles of equal employment opportunity and complies with all applicable laws that prohibit discrimination and harassment in the workplace. Carlos Rosario School is an equal opportunity employer and makes all employment-related decisions without discriminating with regard to race, ethnicity, color, religion, sex, age, national origin, disability, pregnancy, genetic information, political affiliation, gender identity or expression, sexual orientation, marital status, personal appearance, family responsibilities, matriculation or any other category protected by applicable law.

We believe that each individual employed by us has the right to be free from unlawful discrimination and harassment in the terms and conditions of employment. No form of discrimination or harassment toward any employee, student, or other person in our workplace or at our work sites will be tolerated. This policy applies to recruitment, selection, training, utilization, promotion, benefits, termination, disciplinary actions and all other personnel actions, terms, conditions and privileges of employment.

Workplace Harassment

Consistent with its workplace policy of equal employment opportunity, Carlos Rosario School prohibits and will not condone any form of unlawful harassment based upon a person's protected characteristic, including race, ethnicity, color, religion, sex, age, age, national origin, disability, pregnancy, genetic information, political affiliation, gender identity or expression, sexual orientation, marital status, personal appearance, family responsibilities, matriculation or any other characteristic protected by applicable law.

Sexual Harassment

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when (1) submission to such conduct is made explicitly or implicitly a term or condition of an individual's employment, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decision(s) affecting the individual, or (3) the conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creates an intimidating, hostile, or offensive environment for the employee. Examples of conduct that may constitute sexual harassment may include:



(1) sexual-oriented verbal kidding, teasing, or jokes; (2) unwelcome sexual flirtations, advances, or propositions; (3) verbal abuse of a sexual nature; (4) graphic or verbal commentaries about an individual's body; (5) display or distribution of sexually suggestive material; (6) subtle pressure for sexual activity; or (7) inappropriate physical conduct.

Other Unlawful Harassment

Harassment is generally defined as unwelcome verbal or non-verbal conduct based on a person's protected characteristic (including but not limited to race, ethnicity, color, religion, national origin, age, sexual orientation, pregnancy, marital status, genetic information or disability) that denigrates or shows hostility or aversion toward the person because of the protected characteristic and which affects the person's employment opportunities or benefits, has the purpose or effect of unreasonably interfering with the person's employment opportunities or benefits, or has the purpose or effect of creating an intimidating, hostile or offensive work environment. Harassing conduct may include, for example, epithets, slurs or negative stereotyping; verbal abuse; threatening, intimidating or hostile acts; denigrating jokes; display or distribution of written or graphic material that denigrates or shows hostility or aversion toward an individual or group.

Scope of the Policy

This policy prohibiting unlawful harassment, whether sexual or of another nature, is not limited to relationships between and among employees and prospective employees but also extends to interaction with students, vendors or others in the workplace. No employee should suffer sexual or any other harassment based on a protected characteristic by any vendor, student, volunteer, visitor or other third party. It is also the responsibility of every employee to respect the rights of applicants, other employees, students, volunteers, vendors, and visitors to the School as required under the School's code of conduct.

Complaint Procedure

Carlos Rosario School requires reporting of all incidents of discrimination or harassment, regardless of the identity of the offender. Complaints of harassment or discrimination in violation of this policy, must immediately be reported to the Head of HR or the CEO. Complaints under this policy against the CEO will be investigated with the oversight of the Chair of the Board.

The School will conduct a thorough and prompt investigation of any complaint, and maintain the investigation as confidential to the fullest extent feasible. The School will endeavor to complete the investigation within 30 days. Upon completion of the investigation, Carlos Rosario School will



inform the complainant and take appropriate action up to and including termination, if necessary.

Non-Retaliation

The School will not tolerate any form of retaliation against any employee for, in good faith, making a complaint or assisting in a complaint investigation. An employee who believes that they are being retaliated against in violation of this policy should inform immediately the Head of HR or CEO. Any employee found to have retaliated against any other employee for making a complaint or for assisting in an investigation will be subject to appropriate disciplinary action, up to and including termination.

Knowingly making false and malicious complaints of harassment or discrimination (as opposed to complaints that even if erroneous are made in good faith) may also lead to disciplinary action, up to and including termination.

Drug-free Workplace

Carlos Rosario School has a longstanding commitment to provide a safe and productive work environment free from alcohol and drug abuse. Employees should report to work fit for duty and free of any adverse effects of illegal drugs or alcohol.

Substance Abuse Awareness

Alcohol and drug use can pose a threat to the health and safety of employees and may negatively impact work performance. Moreover, local and federal laws prohibit the unlawful use, manufacture, possession, control, sale, dispensation, or distribution of any illegal narcotic or dangerous drug (“controlled substance”).

Prohibitions

Carlos Rosario School prohibits the unlawful use, possession, control, manufacture, sale, dispensation, or distribution of illegal drugs and/or alcohol on School premises. Note that the School does not permit marijuana for any purpose on campus. Employees who qualify under local law to use marijuana may not possess, store, use or share marijuana in the workplace or during School sponsored events. Carlos Rosario School also prohibits employees from working under the influence of illegal drugs or unlawful use of drugs and/or alcohol.

Employee Notification Requirements

All employees shall abide by this policy and notify the School’s Head of Human Resources of any criminal drug statute conviction for a violation occurring in the workplace no later than 5 days after the conviction. Failure to comply with these conditions will be grounds for disciplinary



action up to and including termination.

Disciplinary Action

Employees may be subject to discipline up to and including termination in the event of:

- work performance impaired as a result of use or abuse of drugs or alcohol (either on or off campus);
- illegal use or abuse of drugs or alcohol on campus or on School business;
- conviction of violating a criminal drug statute in the workplace; or
- violation of any provision of this drug-free workplace policy.

The School cooperates fully with law enforcement. Violations of this policy which are also violations of federal or local law may be referred to the appropriate law enforcement agencies. In addition, the School may be required to notify grant or contracting agencies of an employee's criminal drug statute conviction for a violation that occurs in the workplace.

Employees should direct any questions or report any violations of this policy immediately to the head of Human Resources.

Employee Assistance

Employees who are struggling with alcohol or drugs are strongly encouraged to seek assistance. The School's Employee Assistance Program (EAP) is available free of charge to employees and their families on a confidential basis, 24 hours a day, 7 days a week. Employees who have a concern about drug or alcohol abuse are strongly encouraged to contact the EAP for assistance in finding resources to help with the problem. Employees may contact Human Resources for additional resources.

Open Door Policy

In addition to other employee complaint resolution processes such as for discrimination and whistleblower complaints, Carlos Rosario School maintains an open door policy. We encourage all employees to bring any suggestions or concerns they have to their supervisor or some other member of management for a frank discussion of the issues raised, so Carlos Rosario School can determine if anything can be done in its judgment to address the suggestion or concern.

Whistleblower Policy

Carlos Rosario School is committed to promoting compliance with the laws, rules and regulations that govern its operations and encourages all of its employees to report unlawful



conduct. Below are the procedures by which an employee may report complaints or concerns about any fraudulent, illegal or unethical conduct within the School.

What the Policy Covers

This Whistleblower Policy applies to serious concerns relating primarily to unethical, fraudulent, or illegal business conduct. This Policy is not intended to address every concern that may arise in the workplace. Employees should be aware that the School has other policies and procedures and available channels of communication for reporting certain concerns that may not be covered by this Whistleblower Policy and/or that may have more appropriate mechanisms for addressing such concerns, including the School's discrimination and harassment policies.

Responsibility of All Employees

It is the responsibility of all employees to uphold the conduct standards of the School and all are encouraged to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

The School does not tolerate harassment, retaliation or reprisals of any kind against an employee who has submitted a good faith complaint under this Whistleblower Policy. An employee who retaliates against someone who has submitted a complaint in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns relating primarily to unethical, fraudulent, or illegal business conduct within Carlos Rosario School.

Submitting a Complaint

Employees may submit complaints, concerns and information regarding unethical, fraudulent or illegal conduct to their immediate supervisors. However, if an employee is uncomfortable speaking with their supervisor or is not satisfied with the supervisor's response, or if the concern relates to a particularly serious or sensitive issues including accounting-related matters and allegations of corporate fraud, the employee is encouraged to raise the matter directly with a member of the Human Resources Department or the School's designated Compliance Officer. The current designated Compliance Officer for the School is the CEO. Supervisors and managers are required to report all complaints, concerns and information regarding potential unethical, fraudulent or illegal conduct to the School's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. In the event that the complaint,



concern or information relates to conduct of the CEO, the report should be made to the School's General Counsel.

Accounting and Auditing Matters

The finance committee of the Board of Trustees shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the audit committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a whistleblower complaint must be acting in good faith. Any allegations that have been made in bad faith will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Employees who choose to identify themselves when submitting a report may be contacted in order to gain additional information. Reports of violations or suspected violations will be kept confidential to the extent possible.

Handling of Complaints

Any complaints made under this Whistleblower Policy will be promptly investigated and appropriate action will be taken.