

Accordingly, any form of harassment, whether by a fellow employee, manager, supervisor, or by a third party doing business with SEED, will not be tolerated.

If an employee believes that he or she has been the subject of discrimination or harassment or that he or she has witnessed it in the workplace, the employee should immediately bring concerns to the attention of their supervisor, Human Resources, or any member of management with whom the employee is comfortable.

Acts that may constitute harassment include, but are not limited to:

- Jokes
- Verbal abuse and epithets
- Degrading comments
- The display of offensive objects and pictures
- Other conduct that the individual might reasonably find offensive.

Policy Against Sexual Harassment

SEED DC's policy is to provide its employees with a work environment free from harassment, which includes but is not limited to, harassment on the basis of sex. Sexual harassment is a form of sex discrimination that the School will not tolerate and is against the law. Sexual harassment may include the following conduct where it is unwelcome to the recipient-employee:

- Verbal comments or propositions of a sexual nature,
- The display or circulation of sexually suggestive or explicit visual or printed material, or
- Physical conduct of a sexual nature.

Every employee is expected to be aware of this policy and of the types of conduct that may constitute unlawful harassment, as well as the avenues of assistance provided by SEED for addressing complaints of sexual harassment.

This policy extends to each and every level of the School's operations. Accordingly, sexual harassment, whether by a fellow employee, manager, or non-employee doing business with the School (whether of the same sex or the opposite sex), will not be tolerated. In furtherance of SEED DC's policy to provide each employee with a work environment free from harassment, SEED DC requires that each of its managers be responsible for the prevention and elimination of all forms of harassment within their respective departments.

Acts that are considered to constitute sexual harassment include, but are not limited to, unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature where:

- Submission to such conduct is either an express or implied term or condition of employment;
- Submission to or rejection of such conduct is used as a basis for an employment decision affecting the harassed person;
- The purpose of such conduct is to substantially interfere with the affected individual's work performance, or to create an intimidating, hostile or offensive work environment; or

- The effect of such conduct is to substantially interfere with the affected individual's work performance or create an intimidating, hostile, or offensive work environment.

Examples of conduct that, if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances, including the severity of the conduct and its pervasiveness, include:

- Direct or implied requests by a manager for sexual favors in exchange for actual or promised job benefits (favorable reviews, promotions, salary increases);
- Touching any part of another employee's body;
- Derogatory or provoking remarks about or relating to an employee's gender, sexual orientation or sexual activity;
- Displaying or transmitting sexually suggestive materials or using sexually explicit language or gestures;
- Continuing to ask an employee to socialize on or off duty when that person has indicated an unwillingness to do so;
- Coerced sexual acts;
- Off-duty conduct which falls within the above definition and affects the work environment.

Please note that while this policy is set forth by the Department of Human Resources of promoting a workplace that is free of sexual harassment, the policy is not designed or intended to limit the School's authority to discipline or take remedial action for unacceptable workplace conduct, regardless of whether that conduct satisfies the definition of sexual harassment.

A copy of this policy will be provided to every employee upon hire, and extra copies will be available from the Human Resources Department.

Sexual Harassment Complaint Procedure

Sexual harassment of any kind serves no legitimate purpose and has a disruptive effect on the employee's ability to perform the employee's job properly. SEED DC takes allegations of harassment very seriously and will actively investigate all complaints. If it is determined that harassment has occurred, management will take appropriate action against the offending persons, up to and including termination of employment.

If an employee believes that he or she has been harassed or has witnessed the harassment of others, he or she needs to bring the concerns to the attention of management immediately in any of the following ways:

- Report the conduct to the employee's immediate manager;
- Report the conduct to the employee's manager's manager;
- Report the conduct to the Human Resources Department; or
- Report the conduct to any member of management with whom the employee feels comfortable.

IMPORTANT NOTE: If the particular circumstances make a discussion with or a complaint to the employee's own manager inappropriate (for example the complaint involves the employee's manager), the employee should not hesitate to immediately bring the matter to the attention of the Human Resources Department or any member of senior management.

It is the School's policy that all such matters will be handled with appropriate care and discretion and receives a thorough investigation. When an employee brings a complaint to the attention of any member of management, the Human Resources Manager will be notified and an investigation of the allegations will be undertaken promptly. Such investigation shall generally include, at a minimum, interviews with all persons identified as having direct and personal knowledge of the incident(s) in question.

If the investigation reveals that inappropriate workplace conduct has occurred, management will take prompt and effective remedial action. Such measures are designed to put an immediate stop to the inappropriate conduct as well as prevent its recurrence. Therefore, management retains the right to take whatever action it believes appropriate under the circumstances, up to and including terminating the employment of the offending person.

Reporting Discrimination

An employee who believes that they are being unlawfully subject to discrimination, or who may have observed or received a complaint of discrimination should immediately report the incident(s) to their supervisor or directly to Human Resources. Any supervisor who receives a complaint of harassment or discrimination must report it to Human Resources.

Any person found to have unlawfully harassed another employee will be subject to appropriate disciplinary action, up to and including termination.

Retaliation Prohibited

In addition, retaliation against employees for reporting or complaining of sexual harassment, or for cooperating in the investigation of a report or complaint, is unlawful and will not be tolerated. Retaliation in this context refers to adverse conduct taken because employees reported an actual or perceived violation, opposed practices prohibited, or participated in the reporting and investigation process. Any retaliation will warrant disciplinary action, up to and including terminating the employment of the offending person.

Legal Information

Sexual harassment and the other forms of harassment described above are unlawful under both federal and state law. SEED DC is committed to responding quickly and effectively to any report of harassment and hopes that employees will feel comfortable coming forward and allowing the School to pursue an internal investigation and resolution of the matter. In addition to the School's internal complaint procedure, an employee may also pursue a complaint of sexual harassment by contacting the federal and state agencies listed below:

The United States Equal Employment Opportunity Commission ("EEOC")
1400 L Street, N.W.
Washington, DC 20005

(202) 275-7377 or (800) 669-4000

The District of Columbia Office of Human Rights
441 4th Street, N.W.
Suite 570
Washington, DC 20001
(202) 727-4559

Both of these agencies can be contacted by employees who wish to file a formal charge of harassment. However, as stated above, SEED is committed to responding quickly and effectively to any report of harassment and hopes that all employees will feel comfortable coming forward and allowing us to pursue a resolution of the matter internally.

Open Door Policy

SEED DC believes it is necessary to provide employees with channels of communication so they can have issues or questions promptly addressed. Therefore, employees should feel free to contact the Human Resources Department or any member of management with employment-related questions or concerns. If an employee has an unresolved concern, the employee has the right and responsibility to bring the concern to the attention of upper management. We believe that such concerns can be resolved within SEED DC.

Whistleblower Policy

SEED requires all employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of SEED, employees are expected to practice honesty and integrity in fulfilling our responsibilities. This policy is intended to encourage and enable employees to raise serious concerns internally so that SEED can address and correct inappropriate and unethical conduct and actions.

A whistleblower as defined by this policy is an employee of SEED who reports an activity that he/she considers to be illegal or dishonest. The whistleblower is not responsible for investigating any activities or for determining fault. Appropriate management officials are charged with this responsibility and are expected to take corrective measures.

If an employee has knowledge of a concern or illegal and/or dishonest fraudulent activity, the employee should contact their supervisor or Human Resources immediately. If the employee is not comfortable with or not satisfied with the response provided, employees are encouraged to speak with the Head of School, Assistant Head of School, or the Managing Director. Employees may also confidentially report illegal or dishonest behavior confidentially by mailing a letter to the attention of the Human Resources Manager.

Anyone reporting a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the conflict of interest policy or of applicable laws and regulations. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense. An individual who makes allegations that are not substantiated, in good faith, is fully protected by this policy.

To the extent practicable, confidentiality will be maintained consistent with the needs to conduct an adequate investigation. This whistleblower policy is intended to encourage and enable employees to raise concerns within the organization for investigation and appropriate action. With this goal in mind, no employee who, in good faith, reports a concern shall be subject to retaliation. Moreover, an 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. Any whistleblower who believes he/she is being retaliated against should contact Human Resources immediately.

Employees with any question regarding this policy should contact Human Resources.

Outside Employment

Employees may engage in outside employment provided that it does not interfere with job performance and attendance, or otherwise present a conflict of interest with SEED or SEED's operations.. All employees will be judged by the same performance standards and will be subject to SEED's scheduling requirements, regardless of any existing outside work commitments. All outside employment needs to be acknowledged in writing to your manager. However, an employee's decision to pursue outside employment may neither reveal nor depend upon confidential information regarding the School. A conflict of interest occurs when an employee places or find themselves in a position where their private interests may conflict with the interests of the school or have an adverse effect on the employee's motivation or the proper performance of their job.

During their employment with SEED DC, employees shall devote their full attention and best efforts to the business of the School to protect the interests of both the employees and the School. Activity that involves a potential or apparent conflict of interest may be undertaken only after disclosure by the employee and review and approval, in writing, by the Human Resources Manager. If the School determines that an employee's outside activities interfere with performance or the ability to meet the requirements of the employee's position, the employee may be required to terminate the outside activity if he or she wishes to remain employed with the School.

Employment of Relatives/Fraternization

SEED DC permits the employment of relatives, life partners, or significant others in circumstances that do not present an apparent conflict of interest. SEED DC, in its sole discretion, will determine whether a conflict of interest exists.

Relatives, significant others or life partners will not be permitted to supervise one another (directly or indirectly), and relatives, life partners, or significant others will not be promoted or transferred into the same department or "chain of command" as an employee who is a relative, life partner, or significant other. Employees also should not be assigned to positions in which they have access to salaries, performance reviews, or other confidential information concerning a relative, life partner, or significant other. If two employees become related or involved with one another after employment and their positions present a conflict with this policy, one of the two