

EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

It is the policy of The Gateway School to ensure equal employment opportunity without discrimination or harassment on the basis of actual or perceived race (including traits associated with race), color, creed, religion, ethnicity, national origin, citizenship, immigration status, sex, gender, gender identity or expression, transgender status, age, disability (including pregnancy-related conditions), marital status, familial or caregiver status, status as a victim of domestic violence, sex offenses, or stalking, sexual orientation, sexual and reproductive health decisions of an employee or an employee's dependent (including the decision to use or access a particular drug, device, or medical service), predisposing genetic characteristics, genetic information, the employee's height or weight, criminal history, arrest record, veteran or military status (disabled, recently separated and other protected and armed forces services veterans), known relationship or association with any member of a protected class, or any other characteristic protected by law.

This policy governs all aspects of employment, including recruitment and hiring, compensation, benefits, termination, and all other terms and conditions of employment. All School employees are responsible, individually and collectively, for fostering respect and teamwork in the workplace and for complying with this policy prohibiting discrimination and harassment in all facets of the School's business.

The Head of School has overall responsibility for this policy, and maintains reporting and monitoring procedures. Employees' questions or concerns should be promptly referred to the Head of School.

Anyone found to be engaging in any kind of discrimination or harassment in violation of this or other policies will be subject to disciplinary action, up to and including termination of employment.

NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY

Gateway requires that all individuals be treated with respect and dignity. Conduct prohibited by this policy is prohibited in Gateway, and any school-related setting outside of Gateway, such as during school trips, school meetings, and school-related social events.

This policy applies to all Gateway applicants and employees, but also prohibits the harassment, discrimination, and retaliation by (or of) individuals who are not employees of Gateway, such as employees of contractors, subcontractors, vendors,



consultants, trustees, volunteers, interns, temporary employees, and other persons who provide services in Gateway's workplace or in conjunction with Gateway's employees outside of the workplace.

Gateway does not tolerate any individual verbally or physically harassing any other individual on the basis of actual or perceived race (including traits associated with race), color, creed, religion, ethnicity, national origin, citizenship, immigration status, religion, sex, gender, gender identity or expression, transgender status, age, disability (including pregnancy-related conditions), marital status, familial or caregiver status, status as a victim of domestic violence, sex offenses, or stalking, sexual orientation, sexual and reproductive health decisions of an employee or an employee's dependent (including the decision to use or access a particular drug ,device, or medical service), predisposing genetic characteristics, genetic information, the employee's height or weight, criminal history, arrest record, veteran or military status (disabled, recently separated and other protected and armed forces services veterans), known relationship or association with any member of a protected class, or any other characteristic protected by law. Any such harassment/discrimination may violate federal, state, and local laws and will not be tolerated.

Some examples of prohibited harassment include the following:

- Verbal conduct such as threats, epithets, derogatory comments, or slurs;
- Written conduct such as letters or correspondence (including emails, text messages, and social media posts);
- Visual conduct such as derogatory posters, photographs, cartoons, drawings, or gestures; and
- Physical conduct such as assault, unwanted touching, or blocking normal movement.

Gateway's Sexual Harassment Prevention Policy specifically outlines harassment based on sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity, and the status of being transgender; and the reporting procedures. The Sexual Harassment Prevention Policy is distributed separately to all employees at the beginning of every academic year and to all newly hired employees. A copy is also available, at any time, from Human Resources.

This policy prohibits not only behavior that constitutes unlawful harassment, but also other inappropriate or unprofessional behavior that may reasonably be considered offensive or otherwise inappropriate. The purpose of this policy is not to regulate our



employees' personal morality, but to ensure that in the workplace, no one is subject to conduct that could constitute unlawful harassment or discrimination. Nothing in this policy limits Gateway's ability to take corrective action for conduct that it deems inappropriate, unprofessional, or otherwise inconsistent with its expectations of its employees or other community members, even if the conduct does not constitute unlawful discrimination or harassment.

Retaliation Prohibited

Gateway will not retaliate and prohibits any form of retaliation against any individual who reports or provides information in good faith about discrimination or harassment, or participates in an investigation of such reports. Retaliation against an individual for reporting harassment or discrimination, or for participating in an investigation of a claim of harassment or discrimination, is a serious violation of this policy and, like harassment or discrimination itself, may subject the individual who engages in retaliation to disciplinary action up to and including termination of employment.

Reporting Procedure

Gateway strongly urges the prompt reporting of all incidents of discrimination, harassment, or retaliation, regardless of the offender's identity or position.

Any employee who believes that they have been the subject of prohibited discrimination, harassment, and/or retaliation or is aware of any conduct which may be prohibited by this policy is strongly encouraged to report (orally or in writing) immediately the facts forming the basis of that belief or knowledge to their supervisor, the Head of School, or Director of Human Resources. Any employee who witnesses any conduct which may be prohibited by this policy must immediately notify their supervisor. However, individuals should not feel obligated to file their complaint with their immediate supervisor first, and may instead bring the matter directly to the attention of the Head of School or Director of Human Resources.

Upon receiving a complaint, Gateway will promptly conduct a thorough and impartial investigation. It is the obligation of all employees to cooperate in such an investigation. Those responsible for the investigation will maintain the confidentiality of the allegations of the complaint and the identity of the person(s) involved, subject to the need to (a) conduct a full and impartial investigation, (b) remedy any violations of Gateway's policies, (c) monitor compliance with Gateway's policies, (d) disclosures required by the law or legal process.



The investigation generally will include, but may not be limited to, discussion with the complaining employee, the party against whom allegations have been made, and witnesses, if appropriate. The School may review documents, request information or materials from individuals and may review electronic and hard-copy files or communications. Gateway prohibits retaliation against any employee who makes a complaint under this policy or participates in Gateway's investigation.

In the event that an investigation establishes that an employee has engaged in conduct or actions constituting discrimination, harassment, and/or retaliation in violation of this policy, Gateway may take corrective action, up to and including termination of employment. Even if it is determined that conduct is not discrimination or harassment, it may violate another policy of Gateway or be nonprofessional conduct that justifies discipline.

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

Responsive Action

At the conclusion of its investigation, Gateway will take action, if any, it believes is appropriate under the circumstances to resolve prohibited conduct and to prevent the occurrence of such conduct in the future. Responsive action may include, but is not limited to, training, referral to counseling, monitoring of the offender, and/or disciplinary action such as warning, reprimand, withholding of a promotion or pay increase, reduction of wages, demotion, reassignment, temporary suspension without pay, or termination.

If an employee making a complaint does not agree with the resolution imposed, the employee may appeal to Gateway's Head of School, specifying the nature of the objection. The Head of School or their designee will review the process, the determination and the resolution, and may, in whole or in part, sustain the original determination, revise the original determination, or refer the matter for further review and decision. Individuals who have questions or concerns about these policies should talk with the Head of School or Director of Human Resources.

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