



Indispensable Tools for Today's ELL Professionals

We value and believe in having a group of diverse individuals to make our team stronger. We strive to provide equal employment opportunities and a discrimination and harassment free workplace through our ADA, EEO, and anti-harassment/sexual harassment policies, which are laid out below. We believe in paying our employees properly and providing a safe work environment for all. We have the following policies to protect our employees and our business.

Code of Conduct

Our work environment and our team members create and shape the Ellevation culture. Ellevation expects team members to act professionally and courteously with all partners and fellow team members at all times. Ellevation team members also are required to conduct business to meet the highest moral, legal and ethical standards. Ellevation team members are expected to adhere to the following:

- Adhere to all applicable policies and regulations in this handbook and any employment agreements.
- Be honest, fair and trustworthy in all of your Ellevation activities and relationships.
- Avoid all conflicts of interest between work and personal affairs.
- Foster an atmosphere in which fair employment practices extend to every member of the Ellevation community.
- Strive to create a safe workplace and to protect the environment.
- Help Ellevation's leaders sustain a culture where ethical conduct is recognized, valued and exemplified by all team members.

Our Code of Conduct expects team members to follow simple, straight-forward, ethical business rules that are good for Ellevation, team members and partners. There are some situations that may result in disciplinary action or even termination of employment. The decision to impose a particular penalty, such as a warning, suspension or immediate termination is strictly within the discretion of the company. Ellevation management may elect to skip or forego certain disciplinary steps in light of the severity of any particular infraction. Ellevation's management may impose a particular penalty, such as a warning, suspension or immediate termination for specific actions and unethical behaviors. Some examples of cause for disciplinary action, up through and including termination include:

- Theft or inappropriate removal or possession of property that does not belong to an individual.
- Falsification of timekeeping records, employment records, employment information or other company records.
- Inappropriate use of Ellevation's electronic mail systems or internet access.
- Soliciting, distributing literature, or conducting non-work, or unauthorized meetings on company time or on company property during the work day.
- Unauthorized use of Ellevation's equipment, materials or facilities.

- Working under the influence of alcohol or illegal drugs.
- Possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace, while on duty is strictly prohibited.
- Unauthorized possession or use of firearms, fireworks, or any other weapon on company property while engaged in company business.
- Fighting or threatening violence in the workplace.
- Negligence or improper conduct leading to damage of company-owned or customer-owned property.
- Insubordination or refusal to follow reasonable instruction from a manager.
- Sexual or other unlawful or unwelcome harassment.
- Excessive absenteeism or absence without notice.
- Violation of personnel policies outlined in the Handbook.
- Unsatisfactory performance.
- The sale of or disclosure of partner or student's personal information.

At-Will Employment

Nothing in these policies should be taken to establish or imply a contract of employment or a guarantee of continued employment. All employment with Ellevation is "at-will," which means either you or Ellevation may terminate the employment relationship at any time and for any reason, or for no reason at all, with or without prior notice.

Your Pay

We work hard to ensure we accurately compensate employees and to do so in compliance with all applicable state and federal laws. To ensure that you are paid properly and that no improper deductions are made, you must review your pay stubs promptly to identify and report all errors.

Types of Employees

Exempt employees are those employees falling into one of several exemptions from overtime under the Fair Labor Standards Act (FLSA). Non-exempt employees are employees that do not fall into any of the FLSA exemptions.

Regular, full-time employees are those employees regularly scheduled to work 40 or more hours per week. Regular, part-time employees are those employees regularly scheduled to work less than 40 hours per week.

Deductions Policy for Exempt Employees

If you are classified as an exempt employee, you will receive a salary, which is intended to compensate you for all hours you may work for the Company. This salary will be established at the time of hire or when you become classified as an exempt employee. While it may be subject to review and modification from time to time, such as during salary review times, the salary will be a predetermined amount that will not be subject to deductions for variations in the quantity or quality of the work you perform.

Under federal and state law, your salary is subject to certain deductions. For example, unless state law requires otherwise, your salary can be reduced for the following reasons:

- Full-day absences for personal reasons.
- Full-day absences for sickness or disability.
- Family and Medical Leave absences (either full- or partial-day absences).
- To offset amounts received as payment from the court for jury and witness fees or from the military as military pay.
- The first or last week of employment in the event you work less than a full week.
- Any full work week in which you do not perform any work.

In any workweek in which you performed any work, your salary will not be reduced for any of the following reasons:

- Partial day absences for personal reasons, sickness or disability.
- Your absence on a day because your employer has decided to close a facility on a scheduled work day.
- Absences for jury duty, attendance as a witness, or military leave in any week in which you have performed any work (subject to any offsets as set forth above).

However, unless state law provides otherwise, deductions may be made to your accrued leave for full- or partial-day absences for personal reasons, sickness or disability.

If you believe you have been subject to any improper deductions, you should immediately report the matter to your manager. If the manager is unavailable or if you believe it would be inappropriate to contact that person (or if you have not received a prompt and fully acceptable reply), you should immediately contact People Operations. Elevation will promptly investigate any reports of improper deductions. If an improper deduction is discovered, Elevation will reimburse employees for such improper deductions in a timely manner.

Overtime

There will be times when you will need to work overtime (more than 40 hours in a given workweek) so that we may meet the needs of our customers. Although you will be given advance notice when feasible, this is not always possible. Non-exempt employees must have all overtime approved in advance by their supervisor, and will be paid for all overtime hours worked. Non-exempt employees who work overtime will be paid one and one-half times their regular rate of pay for all hours worked beyond 40 hours in a given week, or as otherwise provided by applicable state law.

California non-exempt employees will also receive overtime pay of one-and-one-half times their regular rate of pay for hours worked in excess of eight and up to and including twelve hours of work in a given workday, and for the first eight hours on the seventh consecutive work day in a workweek. They will also receive double time pay (twice their regular rate of pay) for all hours of work in excess of twelve hours in a given work day, and for all hours of work in excess of eight hours on the seventh consecutive day of work in a given workweek.

Breaks

Employees will be entitled to meal and rest breaks in accordance with applicable state law.

Non-exempt workers in Massachusetts will be entitled to a 30-minute unpaid meal break for every 6 hours of work.

California non-exempt employees will be entitled to a 30-minute unpaid meal break to begin no later than the 5th hour of work. If the employee works 10 or more hours, they will also be entitled to an unpaid meal break beginning no later than the 10th hour of work. California non-exempt employees will additionally be entitled to 10-minute paid rest breaks as follows:

Hours Worked	Number of 10 Minute Rest Breaks
0 to 3.5 hours	0
3.5 to 6 hours	1
6 to 10 hours	2
10 to 14 hours	3

Americans With Disabilities Act (ADA)

We are committed to providing equal employment opportunities to qualified individuals with disabilities. Employees who may need a reasonable accommodation due to a disability should contact their supervisor or People Operations. Ellevation will offer reasonable accommodations to employees where necessary to allow the employee to perform the essential functions of the job, but Ellevation reserves the right to refuse to provide a reasonable accommodation where doing so would pose an undue hardship to the company. Additionally, Ellevation reserves its right not to employ or to continue to employ individuals whose disabilities pose a direct threat to the health or safety of themselves and others when that direct threat cannot be resolved through a reasonable accommodation.

It is your responsibility to notify your supervisor of the need for accommodation. Upon doing so, your supervisor may ask you for your input or the type of accommodation you believe may be necessary or the functional limitations caused by your disability. Also, when appropriate, we may need your permission to obtain additional information from your physician or other medical or rehabilitation professionals. The company will not seek genetic information in connection with requests for accommodation. All medical information received by the company in connection with a request for accommodation will be treated as confidential.

Equal Opportunity Employment

We are committed to providing equal employment opportunity to all individuals regardless of race, color, religion, creed, national origin, ancestry, sex, age, qualified mental or physical disability, sexual orientation, gender identity, expression or status, genetic carrier status,

workers' compensation status, pregnancy, childbirth, or related medical conditions, marital status, familial status, veteran status, military service, application for military service, credit history, crime victim status, homelessness, or any other category or class protected by federal, state or local laws. Equal employment opportunity will be extended to all persons in all aspects of your employer-employee relationship, including recruitment, hiring, training, promotion, transfer, discipline, layoff and termination.

We are strongly committed to this policy, and believe in the concept and spirit of the law. We believe in and practice equal opportunity and affirmative action. People Operations serves as the Equal Opportunity Coordinator and has overall responsibility for ensuring compliance with this policy. All employees are responsible for supporting the concept of equal opportunity and affirmative action and assisting the company in meeting its objectives. Any employee who believes they have been subject to discrimination is encouraged to report the discrimination to their supervisor or People Operations. Ellevation takes allegations of discrimination seriously and will promptly investigate all complaints of discrimination.

We prohibit harassment of one employee by another employee, supervisor or third party for any reason based on a "protected class" including, but not limited to: race, color, religion, creed, national origin, ancestry, sex, age, qualified mental or physical disability, sexual orientation, gender identity, expression or status, genetic carrier status, workers' compensation status, pregnancy, childbirth, medical condition, marital status, any veteran status, any military service, any application for any military service, or any other category or class protected by federal, state or local laws. Harassment of third parties by our employees is also prohibited.

The purpose of this policy is not to regulate the personal morality of employees. It is to ensure that in the workplace, no employee harasses another because of their protected characteristics. While it is not easy to define precisely what harassment is, it includes:

Verbal. Epithets; derogatory comments, slurs, or name-calling; sexually explicit, suggestive, or degrading words to describe an individual; sexually explicit jokes, emails or any other form of written communication, comments, noises, or remarks; racial or ethnic slurs; asking for sexual favors; repeated requests for dates, threats, propositions, unwelcome and unwanted correspondence, phone calls, e-mails, text messages, pictures, images and gifts; or other unwelcome attention.

Physical. Assault; impeding or blocking movement; any physical interference with normal work or movement when directed at an individual; unwanted and unwarranted physical contact, such as touching, pinching, patting, grabbing, brushing against, or poking another employee's body.

Visual. Derogatory or offensive posters, cartoons, or drawings; displaying sexual pictures, writings or objects; obscene letters or invitations; staring at or directing attention to an employee's anatomy; leering; sexually oriented or suggestive gestures.

Cyberstalking. Harassment using electronic communication, such as e-mail or instant messaging (IM), or messages posted to a website, blog, or discussion group, including Facebook and LinkedIn.

Sexual. See section ‘Sexual Harassment’.

Any employee who believes that they have been harassed should report the situation immediately to one of the following members of management who have been designated to receive such complaints: Lauren Melton, VP of People Operations at (617) 307-5035 or Jordan Meranus, CEO at (617) 307-5756 and 38 Chauncy Street Boston, MA 02111. If an employee makes a report to any of these members of management and the manager either does not respond or does not respond in a manner the employee deems satisfactory or consistent with this policy, the employee is required to report the situation to one of the other members of management designated in this policy to receive complaints.

The company will investigate all such reports as confidentially as possible. Adverse action will not be taken against an employee because they, in good faith, report or participate in the investigation of a violation of this policy. The company will not retaliate against any employees for making a complaint under this section or participating in the investigation. Violations of this policy are not permitted and may result in disciplinary action, up to and including discharge.

Sexual Harassment

I. Introduction

Any type of sexual harassment is against company policy and may be unlawful. Harassment of third parties by our employees is also prohibited. The purpose of this policy is not to regulate the morality of employees. It is to ensure that in the workplace, no employee is subject to sexual harassment.

Sexual harassment of any kind occurring in the workplace or in other settings related to the employment relationship will not be tolerated. Violations of this policy may result in disciplinary action, up to and including discharge. Retaliation against an individual who has reported or complained about sexual harassment and retaliation against individuals who cooperate in an investigation of a sexual harassment complaint is unlawful and will not be tolerated by this company.

Because Ellevation takes allegations of sexual harassment seriously, we will respond promptly to complaints of sexual harassment and where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

Please note that this policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct that we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment.

II. Definition of Sexual Harassment

For the purposes of this policy, sexual harassment is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when,

- a) submission to or rejection of such advances, requests, conduct or communication is made either explicitly or implicitly a term or condition of employment; or
- b) submission to or rejection of such advances, requests, conduct or communication by an individual is used as a basis for employment decisions affecting such individual; or
- c) such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

Under these definitions, direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits or continued employment constitutes sexual harassment.

The legal definition of sexual harassment is broad and in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a workplace environment that is hostile, offensive, intimidating or humiliating to workers of any gender may also constitute sexual harassment. This may include the dissemination of sexually explicit voice mail, e-mail, graphics, downloaded material or websites in the workplace. The conduct prohibited by this policy includes conduct in any form including but not limited to e-mail, voice mail, chat rooms, Internet use or history, text messages, pictures, images, writings, words or gestures.

While it is not easy to define precisely what sexual harassment is, it includes, but is not limited to:

1. Unwelcome sexual advances.
2. Requests for sexual favors.
3. Verbal or physical conduct of a sexual nature when submission to that conduct is made either explicitly or implicitly as a condition of employment.
4. Verbal or physical conduct of a sexual nature when submission to or rejection of such conduct by an individual is used as a component of the basis for employment decisions affecting that individual.
5. Verbal or physical conduct of a sexual nature that has the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Further examples of sexual harassment include, but are not limited to: sexually-related drawings, pictures, jokes, teasing, e-mails, text messages, uninvited touching or other sexually-related comments.

The complainant does not have to be the person at whom the unwelcome sexual conduct is directed. The complainant, regardless of gender, may be a witness to and personally offended by such conduct. The harasser may be anyone including a supervisor, a co-worker, or a non-employee, such as a recipient of public services or a vendor.

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment, and retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is unlawful and will not be tolerated by Ellevation.

III. Complaints of Sexual Harassment

Any employee who believes that (s)he is a victim of sexual harassment should immediately report such actions in accordance with the following procedure. All complaints will be promptly and thoroughly investigated.

1. Any employee who believes that they are a victim of sexual harassment or has been retaliated against for complaining of sexual harassment, should report the situation immediately to one of the following members of management who have been designated to receive such complaints: Lauren Melton, Vice President People Operations at (617) 307-5035 or Jordan Meranus, CEO at (617) 307-5756 and 38 Chauncy Street Boston, MA 02111. If an employee makes a report to any of these members of management and the manager either does not respond or does not respond in a manner the employee deems satisfactory or consistent with this policy, the employee is required to report the situation to one of the other members of management designated in this policy to receive complaints.
2. The company will investigate every reported incident immediately. Any employee, supervisor or agent of the company who has been found to have violated this policy may be subject to disciplinary action, up to and including immediate discharge.
3. The company will conduct all investigations in such a way as to maintain confidentiality to the extent practicable under the circumstances. The investigation will ordinarily include a private interview with the person or persons filing the complaint, the alleged harasser(s), and any witnesses. When the investigation is completed, the agency will, to the extent appropriate, inform the person filing the complaint and the person alleged to have committed the sexual harassment the results of the investigation. If it is determined that inappropriate conduct has occurred, Ellevation will act promptly to eliminate the offending conduct, and where it is appropriate will impose disciplinary action.
4. The reporting employee and any employee participating in any investigation under this policy have the company's assurance that there will be no retaliation or change in the terms and conditions of employment as a result of an employee's sexual harassment complaint made in good faith.

IV. Disciplinary Action

If it is determined that an employee has engaged in inappropriate conduct, Ellevation will take such action as is appropriate under the circumstances. Such action may range from counseling to termination from employment, and may include such other forms of disciplinary action deemed appropriate under the circumstances.

V. State and Federal Remedies

We strongly encourage our employees to file a complaint of sexual harassment using our company's complaint procedure. However, in addition to our internal complaint procedure and at any time, you may file a formal complaint with either your state government agency listed below, your local EEOC office, or both. Each agency has a relatively short time for filing a complaint (300 days for both the EEOC and MCAD).

State	Government Agency	EEOC Office
California	California Department of Fair Employment and Housing - Los Angeles (FEPA) 320 West 4th Street, 10th Floor Los Angeles, CA 90013 (800) 884-1684 California Department of Fair Employment and Housing - Bay Area Regional Office (FEPA) 39141 Civic Center Drive, Suite 250 Fremont, CA 94538 (800) 884-1684	San Francisco District Office 450 Golden Gate Avenue 5 West, P.O Box 36025 San Francisco, CA 94102-3661 Los Angeles District Office Roybal Federal Building 255 East Temple St., 4th Floor Los Angeles, CA 90012
Colorado	Colorado Civil Rights Division (FEPA) 1560 Broadway, Suite 1050 Denver, Colorado 80202 Phone: 303-894-2997 Fax: 303-894-7830	Denver Field Office 303 E. 17th Avenue Suite 410 Denver, Colorado 80203
Florida	Miami-Dade County Commission on Human Rights 111 NW 1st Street, 21st Floor Miami, FL 33128-1965 Phone: 305-375-5272	Miami District Office Miami Tower 100 SE 2nd Street, Suite 1500 Miami FL 33131
Georgia	Georgia Commission on Equal Opportunity Suite #1002 - West Tower 2 Martin Luther King, Jr. Drive, S.E. Atlanta, GA 30334	Atlanta District Office Sam Nunn Atlanta Federal Center 100 Alabama Street, SW, Suite 4R30 Atlanta, Georgia 30303
Illinois	Illinois Department of Human Rights - Chicago Office (FEPA) 100 West Randolph Street Suite 10-100 Chicago, Illinois 60601	Chicago District Office 500 West Madison Street Suite 2000 Chicago, Illinois 60661

	Phone: 312-814-6200	
Massachusetts	<p>Massachusetts Commission Against Discrimination Boston Office One Ashburton Place, Room 601 Boston, MA 02108-1518 (617) 994-6000 (voice) (617) 994-6196 (TTY)</p> <p>Springfield Office 436 Dwight Street, Room 220 Springfield, MA 01103 (413) 739-2145</p>	<p>Boston Area Office John F. Kennedy Federal Building 475 Government Center Boston, MA 02203 (617) 565-3200 (voice) (617) 565-3204 (TTY)</p>
Maine	<p>Maine Human Rights Commission (FEPA) 51 State House Station Augusta, ME 04330-0051 Phone: 207-624-6062 Fax: 207-624-6063 TTY: 207-624-6064</p>	<p>Boston Area Office John F. Kennedy Federal Building 475 Government Center Boston, MA 02203 (617) 565-3200 (voice) (617) 565-3204 (TTY)</p>
New Hampshire	<p>New Hampshire Commission For Human Rights 2 Chenell Drive Concord, NH 03301-8501 Phone: 603-271-2767</p>	<p>Boston Area Office John F. Kennedy Federal Building 475 Government Center Boston, MA 02203 (617) 565-3200 (voice) (617) 565-3204 (TTY)</p>
New Jersey	<p>New Jersey Division on Civil Rights (FEPA) 31 Clinton Street Newark, New Jersey 07102-5233 Phone: 973-648-2700</p>	<p>Newark Area Office Two Gateway Center Suite 1703 283-299 Market Street Newark, NJ 07102</p>
New York	<p>New York City Commission on Human Rights 40 Rector Street - 9th Floor New York, NY 10006 Phone: 212-306-7500</p> <p>New York State Division of Human Rights (FEPA) One Fordham Plaza, 4th Floor New York, NY 10458 Phone: 718-741-8400 Fax: 718-741-3214 TTY: 718-741-8304</p>	<p>New York District Office 33 Whitehall Street, 5th Floor New York, NY 10004</p>
Nevada	<p>Equal Rights Commission Las Vegas 1820 East Sahara Avenue Suite 314 Las Vegas, NV 89104 Phone (702) 486-7161 Fax (702) 486-7054</p> <p>Equal Rights Commission Northern Nevada</p>	<p>Las Vegas Local Office 333 Las Vegas Blvd South Suite 5560 Las Vegas, NV 89101 Phone: 1-800-669-4000 Fax: 702-388-5094 TTY: 1-800-669-6820</p>

	1325 Corporate Blvd. Room 115 Reno, NV 89502 Phone (775) 823-6690 Fax (775) 688-1292	
North Carolina	North Carolina Office of Administrative Hearings, Civil Rights Division 1711 New Hope Church Road Raleigh, NC 27609	Charlotte District Office 129 West Trade Street Suite 400 Charlotte, North Carolina 28202
Oklahoma	Tulsa Office of Human Rights Commission (FEPA) Kerr Office Building 440 S. Houston, Rm 302 Tulsa, Oklahoma 74127 Phone: 918-581-2733 Toll Free: 888-456-2006 Fax: 918-581-2940	
Rhode Island	Rhode Island Commission for Human Rights (FEPA) 180 Westminster Street, 3rd Floor Providence, RI 02903 Phone: 401-222-2661 Fax: 401-222-2616 TTY: 401-222-2664	Boston Area Office John F. Kennedy Federal Building 475 Government Center Boston, MA 02203 (617) 565-3200 (voice) (617) 565-3204 (TTY)
South Carolina	South Carolina Human Affairs Commission (FEPA) 1026 Sumter Street, Suite 101 Columbia, SC 29201 Mailing Address P.O. Box 4490 Columbia, SC 29240 Phone: 803-737-7800 Fax: 803-253-4191 TTY: 803-253-4125	Greenville Local Office 301 N. Main Street Suite 1402 Greenville, SC 29601
Tennessee	Tennessee Human Rights Commission 312 Rosa L Parks Avenue, 23rd Floor Nashville, TN 37243 Toll Free: (800) 251-3589 Phone: 615-741-5825 Fax Numbers: 615-253-1886 or 615-532-2197	Nashville Area Office 220 Athens Way Suite 350 Nashville, TN 37228-9940 Phone: 1-800-669-4000 Fax: 615-736-2107 TTY: 1-800-669-6820
Texas	Texas Workforce Commission, Civil Rights Division 1215 Guadalupe Street Austin, Texas 78701	Dallas District Office 207 S. Houston Street 3rd Floor Dallas, Texas 75202
Utah	Utah Anti-Discrimination and Labor Division (FEPA) 160 East 300 South, 3rd Floor P.O. Box 146630 Salt Lake City, UT 84114-6630 Phone: 801-530-6801	Phoenix District Office 3300 North Central Avenue Suite 690 Phoenix, AZ 85012-2504

	Fax: 801-530-7609 TTY: 801-530-7685	
Washington DC		Washington Field Office 131 M Street, NE Fourth Floor, Suite 4NWO2F Washington, DC 20507-0100 Phone: 1-800-669-4000 Fax: 202-419-0739 TTY: 1-800-669-6820 ASL Video Phone: 844-234-5122

Complaints must be filed within 300 days of the adverse action.

Massachusetts Pregnant Workers Fairness Act

Ellevation employees have the right to be free from discrimination due to pregnancy or a condition related to pregnancy, including the right to reasonable accommodations for conditions related to pregnancy. We will accommodate conditions related to pregnancy, including post-pregnancy conditions such as the need to express breast milk for nursing child, unless doing so would pose an undue hardship to Ellevation. Ellevation will not require medical documentation about the need for an accommodation if the accommodation requested is for: (i) more frequent restroom, food or water breaks; (ii) seating; (iii) limits of lifting no more than 20 pounds; and (iv) private, non-bathroom space for expressing breast milk. Ellevation may request medical documentation for other accommodations. This notice will be provided to all new hires and employees who notify Ellevation of a pregnancy or pregnancy-related condition.

Drugs and Alcohol

It is the intent of Ellevation to provide and maintain a work environment that is free of drugs and alcohol. Alcohol and drug use in the workplace can be harmful to the health and safety of Ellevation employees as well as to the security of the business, its property, equipment, and facilities. To promote safe, efficient, and productive working conditions for our employees, Ellevation has established this policy concerning the use of alcohol and drugs.

Definitions for purposes of this Policy:

- “Illegal drugs or other controlled substances” means (a) marijuana (unless legal in the employee’s state of residence or if an employee has a registered medical marijuana card); and (b) *any* drug or substance that (i) is not legally obtainable; or (ii) is legally obtainable but has not been legally obtained; or (iii) has been legally obtained but is being sold or distributed unlawfully.
- “Legal drug” means any drug, (including any prescription, over-the-counter drug, or lawful use of marijuana) that has been legally obtained and that is not unlawfully sold or distributed.
- “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 manner that is

contrary to the instructions or recommendations of the prescribing physician or manufacturer.

- “Possession” means that an employee has the substance on his or her person or otherwise under his or her control.

The following acts are prohibited, and subject an employee to discharge:

- The unauthorized use, possession, purchase, sale, manufacture, distribution, transportation, or dispensation of alcohol, any illegal drug or other controlled substance; or
- Being under the influence of alcohol, illegal drugs or other controlled substances.
- The purchase, sale, manufacture, distribution, transportation, dispensation, or possession of any legal prescription drug in a manner inconsistent with law, or the abuse of any legal drug; or
- Working while impaired by the use of a legal drug whenever such impairment might endanger the safety of the employee or others; pose a risk of significant damage to company property; or substantially interfere with the employee’s job performance or company business.

The prohibitions of this section apply whenever the interests of the Company may be adversely affected, including any time the employee is on Company premises, conducting Company business, regardless of location; operating or responsible for the operation or care of Company property; or responsible for the safety of other employees.

In the event of a violation of this policy, the Company will take appropriate disciplinary action, which may include but not be limited to, counseling, a written warning, or termination of employment. Appropriate disciplinary action in each situation will be determined by the Company in its sole discretion based on the totality of the circumstances, including but not limited to the severity of the violation, and whether there have been repeated violations of this policy.

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 employee impairment in violation of this policy.

To the extent required by applicable law, Ellevation will make reasonable accommodations to any employee with a qualified disability that requires the employee to take medication which has side effects that impacts an employee’s ability to perform his or her job.

The Company provides alcohol (as well as non-alcoholic drinks) for consumption at various social functions such as “Fun Fridays.” In connection with these social events, the Company maintains alcohol in what is fondly called the “beer fridge.” Alcohol in the “beer fridge” is intended for use at Company social events and should never be consumed during work time.

The consumption of alcohol at Company social events does not violate this policy provided that employees are expected to always use good judgment and act responsibly when consuming alcohol at a Company-sponsored function (on or off-site). If there is any question about an employee's ability to drive within legal limits following a Company social event, the employee should not drive and instead should take advantage of Lyft, Uber, taxis, or ride with a coworker.

Employees under the age of 21 will not be served alcoholic beverages at any Ellevation-sponsored social events and may not consume alcohol.

Workplace Violence

Violence, or threats of violence, by an employee or anyone else against an employee, supervisor or member of management will not be tolerated. If you receive or overhear any threatening communications from an employee or outside third party, report it immediately to your supervisor or People Operations. Do not engage in either physical or verbal confrontation with a potentially violent individual. If you encounter an individual who is threatening immediate harm to an employee or visitor to our premises, contact an emergency agency (such as 911) immediately.

All reports of work-related threats will be kept confidential to the extent possible, and will be investigated and documented. Employees are expected to report and participate in an investigation of any suspected or actual cases of workplace violence and will not be subjected to disciplinary consequences for making a report or for participating in any investigation thereof.

Violations of this policy, including your failure to report or fully cooperate in the company's investigation, may result in disciplinary action, up to and including discharge. Where appropriate and/or necessary, the Company will also take whatever legal actions are available and necessary to stop the conduct and protect Company employees and property.

Family Disclosure of Potential Conflicts of Interest

A number of our current and potential district partners require us to disclose any potential conflicts of interest that might arise as a result of an Ellevation employee having a relative who works for the district. Consequently, on an annual basis, Ellevation employees will be asked to sign a disclosure indicating if the employee has any immediate family members who work at any school district, regardless of whether that district is a current Ellevation partner. For this disclosure, "immediate family" means spouse, parent, child, brother, sister, grandparent, or grandchild, and includes step, half, and in-law relationships. Employees are required to notify People Ops of any new potential conflicts of interest during the year.