



Sexual Harassment and/or Discrimination Prohibition Policy

Statement of Policy

It is the policy of Meridian to maintain a working environment free from sexual, racial, age-based, religious, ethnic, disability, sexual orientation, and any other form of harassment of any Meridian personnel or applicant. Such harassment in any manner or form is expressly prohibited. It is the policy of Meridian that all Meridian personnel, contractors, applicants and students are to be treated in a respectful and professional manner. Also, no individual is to be subjected to any unwelcome conduct that is or should be known to be offensive because of his or her gender, race, age, religion, ethnicity, disability, sexual orientation, or other protected category. Further, no Meridian personnel shall engage in unwelcome and offensive conduct towards any individual that is motivated by the individual's gender, race, age, religion, ethnicity, disability, sexual orientation, or other protected category. The term "harassment" in this policy includes conduct which is contrary to this policy, even if it does not meet the legal definitions for harassment.

This policy applies to all employees, volunteers, Board members, contract workers, and all applicants for such positions.

All reported or reasonably suspected occurrences of harassment will be investigated in a confidential manner and as promptly and thoroughly as is practicable and necessary. Where harassment has occurred, Meridian will take appropriate disciplinary and/or other corrective action, up to and including termination.

There will be no retaliation against an individual who has in good faith complained about or reported alleged harassment or who has cooperated with an investigation of alleged harassment.

Types of Workplace Sexual Harassment

For purposes of this policy, harassment in the workplace includes the following:

Hostile Environment Harassment



Hostile environment sexual harassment may occur when there are unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature. Also, non-sexual conduct that is unwelcome and offensive and which is directed at an individual because of the individual's gender (female or male) may create a hostile environment. Racial, age-based, religious, ethnic, disability, sexual orientation, gender identity and expression and other forbidden forms of harassment may occur when there is conduct which is motivated by or relates to an individual's race, age, religion, ethnicity, disability, sexual orientation, or other legally protected characteristics. In all such cases, hostile environment harassment occurs when such conduct is sufficiently severe or pervasive to and does: (1) unreasonably interfere with an individual's work performance, or (2) create an intimidating, hostile or offensive work environment.

"Quid Pro Quo" Sexual Harassment

"Quid Pro Quo" sexual harassment may occur in the workplace when there are unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature, when:

- (1) submission to such conduct is an explicit or implicit condition of employment; or
- (2) submission to or rejection of such conduct is used as the basis for employment decisions.

Conduct Prohibited by the Policy

Meridian's policy also prohibits any unwelcome harassing conduct, even if the conduct is not sufficiently severe or pervasive enough to create a hostile environment or is not "quid pro quo" harassment.

It is not possible to list all the conduct that may violate this policy or is otherwise unacceptable. The following are examples only:

- All unwelcome and offensive jokes, stories, comments, or verbal abuse of a sexual, age-based, religious, racial, or ethnic nature, or relating to or motivated by gender, race, age, religion, sexual orientation, or disability.



- Use of any degrading or derogatory words or language to describe or refer to any person, or any harsh or unfair conduct towards another person that is motivated by the person's gender, race, religion, or other protected category.
- The display in the workplace or on Meridian property of objects or pictures—whether print or electronic—that expressly or implicitly degrade individuals or groups on the basis of race, age, gender, religion, ethnicity, sexual orientation, or disability.
- Offering, promising, or granting preferential treatment to any employee or applicant because of that individual's age, religion, race, ethnicity, gender, sexual orientation, or disability, or as a result of, or in anticipation of, that individual's engaging in or agreeing to engage in sexual or romantic conduct, even if the conduct is consensual.
- Using Meridian e-mail, voice-mail, or Internet access for any purpose which reasonably is or should be known to be offensive because of its sexual, religious, racial or ethnic content, or its relationship to gender, sexual orientation, or disability. Note: no Meridian personnel shall use Meridian equipment to access media sites—including but not limited to Internet Web sites—known to contain material that is sexually prurient or graphic, or that promotes or advocates sexism, racism, or other forms of bigotry based on gender, race, religion, or other protected category. Refer to the technology policy for more information.
- Unwelcome flirtation, sexual advances, propositions, or pressures for sexual favors, and unwelcome inquiries into someone's sexual experience or activity, including but not limited to sexually foul language, leering and whistling, or other unwelcome sexually suggestive conduct.
- Unwelcome and unnecessary physical contact, other than incidental and/or innocuous contact.

Sexual Harassment of and/or Between Students/Title IX Violations

Sexual harassment of students consists of verbal or physical conduct of a sexual nature, but against an employee, agent, or another student of Meridian and that denies, limits, or conditions the provision of aid, benefits, services, or treatment protected under Title IX of the Education Amendments of 1972 on the basis of sex. Unwelcome sexual advances, requests for sexual favors, and/or other verbal or physical conduct of a sexual nature constitutes sexual harassment when:



1. submission to such conduct is made either explicitly or implicitly a term or condition of an individual's education; or

2. such conduct has the purpose or effect of unreasonably interfering with the individual's education creating an intimidating, hostile, or offensive environment.

Such actions include, but are not limited to, the following conduct directed at students:

1. unwelcome sexual flirtations, advances, or propositions;

2. verbal or written abuse of a sexual nature

3. graphic verbal comments about the student's body

4. sexually degrading words used to describe a student; and

5. unwelcome and non-consensual physical touching of a sexual nature.

Given the special nature of the relationship between students and Meridian employees, extreme caution should be exercised by Meridian employees to avoid any situation involving comments of a sexual nature, particularly in the presence of students. It is recognized that discussions involving sexual relations and the human body are part of mandated curriculum on certain areas (e.g., health education) and are, therefore, not restricted by this policy. Nonetheless, there is no conflict between this policy and any curriculum mandates to which



Meridian must adhere. Thus, the teaching of the Meridian's curriculum will not constitute a charged violation of this policy.

Sexual Harassment and/or Discrimination Complaint Procedure for Employees,

Notification Procedures

Any Meridian personnel or applicant who feels that he or she is being or has been subjected to harassment or who knows of or suspects the occurrence of harassment should promptly and in confidence inform his/her supervisor or Head of School. If for any reason a person does not feel comfortable reporting to one of these individuals, that person should report the matter to any Meridian supervisor.

In addition, all management and supervisory personnel at Meridian have an affirmative duty to report promptly to one of the individuals designated above any harassment that they observe, that is made known to them by others, or that they reasonably suspect has occurred.

Investigation Procedure

All reported occurrences of harassment will be investigated as promptly and thoroughly as is practicable and as is required under the circumstances. The individual who makes the report or is the target of the alleged harassment will be assured that all forms of harassment are expressly prohibited, that Meridian will conduct a confidential investigation and that Meridian will take appropriate corrective action if harassment is found to have occurred.

Meridian will designate the individual who will be responsible for conducting the investigation of reported incidents of harassment. The timing, scope, and extent of the investigation will be determined by Meridian on a case-by-case basis, considering the circumstances of the alleged harassment. All investigations will be conducted to protect, as much as practicable, the privacy of, and minimize the suspicion toward, all persons concerned.

Meridian expects Meridian personnel who are contacted in connection with an investigation to cooperate fully.

Procedure Pending Investigation

Pending the outcome of an investigation, reasonably necessary and prudent interim measures, such as separation of the complainant and the alleged offender, suspension of the alleged offender, temporary leave for the complainant, etc., will be taken at Meridian's discretion,



taking into consideration the complainant's wishes, the seriousness of the accusations, the background of the situation, and any other relevant information.

Resolution and Outcome of Investigation

Following an investigation, Meridian will take such action that it deems necessary or appropriate under the circumstances:

- **No Violation.** In the event that the investigation discloses no violation of this policy or is inconclusive, all necessary parties will be so advised.
- **Violation.** In the event that the investigation discloses a violation of this policy, Meridian will normally communicate its findings to both the complainant and the alleged offender. Based upon the totality of the circumstances, appropriate disciplinary and/or other corrective action, up to and including termination, will then be taken. The action taken will be reasonably calculated to prevent any further unacceptable conduct. It is within Meridian's discretion to determine the appropriate corrective action.
- If the complainant or the alleged offender is not satisfied with the resolution, he or she is encouraged to contact Meridian's Head of School, who will render a final decision.

In the event an investigation of a reported or suspected occurrence of harassment fails to reveal harassment and instead reveals that any person has abused the policy by lodging a knowingly false or frivolous complaint, by fabricating facts, by failing to tell the truth, or by knowingly omitting important facts, Meridian may take appropriate disciplinary and/or other corrective action.

No Retaliation

No individual who reports or complains about harassment or unacceptable conduct, or who assists Meridian in its investigation, will be subjected to retaliation. Anyone who feels that he or she has been the victim of, or threatened with, retaliation, should immediately inform one of the individuals identified above for purposes of receiving reports or complaints.

Sexual Harassment/Discrimination Complaint Procedure for Students

1. Informal Procedure – Meridian encourages students who believe they are being harassed to clearly and promptly notify the offender that his or her behavior is unwelcome. If for any reason a student does not wish to confront the offender directly, or if such discussion does not



successfully end the harassment, the student should notify Meridian's designated Title IX Coordinator (**Director of Operations**), his/her Principal or the Head of School. Any student who is uncomfortable for any reason in bringing the matter

to the attention of his/her principal or Head of School should report the matter directly to the Director of Student Support or the COO. The names, address, and telephone numbers of the Head of School, Director of Student Support and the COO are located in the "Notice of Grievance Procedures" section of this Handbook.

The informal procedure should be flexible and the best course of action in any case will depend on various factors. However, a student reporting sexual harassment should be aware that Meridian may decide it is necessary to take action to address the harassment beyond an informal discussion.

2. Formal Procedure – The following steps should be following to make a formal complaint about sexual or other harassment involving students, whether student/staff or student/student harassment:

a. Notification – a student who believes he or she has been subjected to sexual or other harassment by any employee, agent, or other student of Meridian should report the incident to the designated Title IX Coordinator (**Director of Operations**) and his/her principal. Any student who is uncomfortable for any reason in bringing the matter to the attention of his/her principal or Head of School should report the matter directly to the Director of Student Support or the COO. Students are permitted to be accompanied by a friend, relative, guardian, or parent when making a claim of sexual or other harassment. If a parent of a student of the Meridian believes that his/her son/daughter has been subjected to sexual harassment, then the parent should follow the above referenced reporting procedure or refer to the "Notice of Grievance Procedures" section of this Handbook.

b. Description of Misconduct – An accurate record of allegedly objectionable behavior is necessary to resolve a complaint of sexual harassment. All allegations of sexual harassment must be reduced to writing by either the complainant or the recipient of the complaint.



c. Time for Reporting a Complaint – Prompt reporting of complaints is strongly encouraged. While no time limits for filing complaints are contained in this policy, the accurate resolution of sexual harassment complaints will be expedited by timely filing of claims.

d. Protection Against Retaliation – Meridian will not retaliate against any student who files a sexual harassment complaint in good faith. Retaliation is a serious violation of this policy and should be reported immediately. Any employee, agent, or student of Meridian found to have retaliated against a student for good faith reporting of sexual harassment will be subject to appropriate disciplinary action, up to and including discharge from employment and, where appropriate, other legal action for employees and agents, and suspension for students in accordance with District of Columbia law.

3. Meridian will promptly investigate all allegations of sexual harassment in as confidential and sensitive a manner as possible and shall make every reasonable effort, consistent with the best interests of all parties concerned, to complete the investigation within thirty (30) days of receipt of the formal student complaint.

4. The student submitting a complaint of sexual harassment and the alleged harasser shall be notified of the results of the investigation.

Any supervisor, administrator, teacher, employee, agent, or student of Meridian found to have engaged in sexual or other harassment of any student shall be subject to appropriate disciplinary action, up to and including discharge from employment and, where appropriate, other legal action for employees and agents, and up to and including suspension from school for students in accordance with District of Columbia law.

Student Appeals

Any employee or student who wishes to appeal investigation results that there is or is not sexual or other harassment involving a student may do so within ten (10) school days of receipt of the investigation's findings. Such appeal must be made in writing to Meridian's Board



of Trustees. The employee or student shall be entitled to present evidence as to why the investigation results are incorrect. Following a review of that evidence, as well as the information obtained in the investigation process and conclusions derived therefrom, the Board of Trustees shall render a decision. This decision shall be final and binding.

Recordkeeping and Questions:

Where Title IX investigations and other formal allegations of student sexual abuse or other harassment are concerned, Meridian shall maintain a written record of all such complaints for a three (3) year period. Meridian will also document the steps taken with regard to such investigations, as well as conclusions reached and disciplinary action (if any) taken. Meridian shall also maintain these documents for, a minimum, three (3) years. Any questions regarding sexual harassment and compliance with Title IX of the Education Amendments of 1973 may also be brought to the attention of the Office of Civil Rights, Department of Education, Washington, D.C. 20202

Nondiscrimination Policy: Equal Opportunity in Hiring & Employment

Meridian is an Equal Opportunity Employer. The School's EEO policy prohibits discrimination in employment based on race, color, religion, national origin, disability, sex, age, sexual orientation, gender identity or expression, marital status, political affiliation or any other basis prohibited by applicable law. Under this policy, equal employment opportunity is required in recruitment, hiring, training and development, promotion, termination, compensation, benefits, and all other terms, conditions, and privileges of employment as required by applicable law.

Any employee who feels that a violation of this policy has occurred should bring the matter to the immediate attention of his or her supervisor. An employee who is uncomfortable for any reason in bringing such a matter to the attention of his or her supervisor shall report the matter to another supervisor, Human Resources, or the Head of School. The School will investigate all such allegations and prohibits any form of retaliation against any who makes such a complaint in good-faith.

Meridian also requires our employees to abide by applicable federal and state nondiscrimination laws in their dealings with all members of the Meridian community—including visitors, vendors, and suppliers.

Employment-at-Will



It is the policy of Meridian that at-will employment can be terminated at the option of the employee or at the option of the Meridian, with or without cause, at any time and for any reason. No employee or representative of Meridian other than the Head of School has the authority to enter into any agreement providing for the employment of any employee for any specified period of time or otherwise modifying this at-will policy. Any such agreement must be explicit, in writing, and signed by the Head of School.

Interns

Internships are subject to regulation by federal agencies. Furthermore, if an internship were not administered properly, it could create a liability for the School. Therefore, no employee or representative of Meridian other than the Head of School or COO has the authority to approve an intern working at or on behalf of the School. The Head of School or COO will make any decision regarding internship in coordination with Human Resources.

Employment Reference Policy

Meridian's standard policy on providing employment references for a current or former employee is to provide a neutral reference, which consists of verifying dates of employment, position title, and work location. Verification of salary will be provided only in response to a written request that includes an authorization by the employee. All verbal or written employment references should be directed to Human Resources. Communications to third parties concerning a present or former employee's performance or conduct, or the reasons for any discipline or termination, are strictly prohibited absent explicit approval from the Head of School.

Notwithstanding the above, if any current or former employee has been accused of child sexual misconduct or abuse during his/her tenure with Meridian or if Meridian has determined that any former or current employee failed to report child abuse in violation of D.C.'s mandatory reporting law or other federal law, Meridian, in compliance with the School Safety Omnibus Act of 2018, will disclose such information—including the outcome and findings of any investigation into the alleged child sexual misconduct and abuse--if contacted by any Local Education Agency ("LEA") or other School that is considering the current/former Meridian employee for prospective employment. Additionally, it is strictly prohibited for any Meridian employee to assist any current/former employee in obtaining employment involving direct interaction with minors if it is known or reasonably suspected that such individual has engaged in child sexual misconduct or abuse in violation of D.C. or federal law.



Drug and Alcohol Policy—Drug-Free Workplace

Statement of Policy

It is the policy of Meridian to create and maintain a drug- and alcohol-free environment in the workplace, as required by the Drug-free Workplace Act of 1988. The abuse of alcohol or controlled substances (including the misuse or abuse of prescription drugs) or the use of illegal drugs, including but not limited to marijuana, cocaine, heroin, morphine, barbiturates, or amphetamines is inconsistent with the professional and responsible behavior we expect of employees, subjects all employees and visitors to unacceptable safety risks and undermines Meridian's ability to operate effectively and efficiently.

It is important to note that federal law and School policy continue to treat marijuana and cannabis as illegal and prohibited despite changes in some state laws. Federal laws that prohibit any use of marijuana and other cannabis products, including medical use, have not changed and take precedence over laws in States that have chosen to legalize either medical or recreational use of marijuana or other cannabis products. In addition, Meridian receives federal funding and as such must abide by additional regulations requiring that recipients prohibit use or possession of drugs in the workplace. Finally, note that if an illegal drug is legalized even at the federal level and even for medical use, the School will still continue to prohibit its use or possession at work—or reporting to work under its influence—as is the case with alcohol.

Therefore, the employees of Meridian are strictly prohibited from engaging in the unlawful manufacture, distribution, dispensation, possession, or use of controlled substances or illegal drugs, as defined above, on Meridian's premises or while conducting Meridian business off Meridian's premises.

Such conduct and/or use of illegal drugs or controlled substances is also prohibited during non-working time to the extent that it, in the opinion of the management of Meridian (1) impairs the employee's ability to perform his or her job; (2) affects Meridian's reputation or threatens its integrity; and (3) jeopardizes the employee and/or others in the workplace. Reporting to work while under the influence of illegal drugs, controlled substances, or alcohol is prohibited (note that if an illegal drug is legalized, its use or possession at work—or reporting to work under its influence—remains prohibited, as is the case with alcohol).

Employees who are convicted of offenses involving controlled substances or alcohol (including DUI) in the workplace must inform the Head of School and Human Resources within five (5) days of the conviction or plea.



Employees who violate any aspect of this policy are subject to disciplinary action, up to and including immediate termination from Meridian.

An employee who is undergoing medical treatment with any controlled substance that may impair his/her physical or mental ability, even if a licensed physician has legally prescribed it, is strongly advised to report such treatment to Human Resources so that an appropriate response can be made in the event of a reaction or emergency. Meridian will determine whether the employee constitutes a direct threat to himself/herself or others. If so, the employee shall not be permitted to work while undergoing such treatment.

Grievance Procedure

Complaint Process—General

Meridian takes measures to maintain a harmonious environment as set forth in the “-Work Environment” policy section of the handbook. Meridian expressly prohibits any form of unlawful employee harassment, retaliation, discrimination, or inharmonious behavior as covered by the policies set forth in the “Work Environment” section of this manual. It is incumbent upon every employee to abide by such environmental policies. Any employee who feels that the conduct of management or another employee is inappropriate or not in compliance with set policies is obligated to report their complaint in writing to their immediate supervisor. If the complaint is against the immediate supervisor, the employee should share their concerns with the next level of management. If the complaint entails discrimination, harassment, abuse or violation of laws protecting against discrimination/harassment or abuse, see “Sexual Harassment and/or Discrimination Complaint Procedure,” “Notice of Procedural Safeguards” and “504 Grievance Procedure” detailed in this handbook.

All complaint reports will be thoroughly addressed by management and be subject to the determination of timing, scope, and extent by Meridian management on a case-by-case basis considering the nature of the complaint. In order to reach a fair resolution, both the complainant and the alleged offender will be requested to provide their interpretation of the complaint.

Complaint Resolution Process—General

Except when otherwise indicated in the “Sexual Harassment and/or Discrimination Complaint Procedure,” “Notice of Procedural Safeguards” and “504 Grievance Procedures” sections,



below, Meridian follows the complaint resolution process described in this section. Following an investigation, Meridian will take such action that it deems necessary to reach a resolution:

- **No Violation.** In the event that the investigation discloses no violation of policy or is inconclusive, all parties deemed necessary by Meridian, including the complainant and the alleged offender, will be so advised.
- **Violation.** In the event that the investigation discloses a violation of policy, Meridian will normally communicate its findings to both the complainant and the alleged offender. Based upon the totality of the circumstances, appropriate disciplinary and/or other corrective action, up to and including termination, will then be taken. The action taken will be reasonably calculated to prevent any further unacceptable conduct. It is within Meridian's discretion to determine the appropriate corrective action.

If the complainant or alleged offender is not satisfied with the resolution, he or she is encouraged to contact Meridian's Head of School, who will render a final decision. In the event that the Head of School is the complainant or alleged offender, the Board of Trustees will designate a designee to resolve the matter.

In the event an investigation of a complaint fails to reveal a violation of policy and instead reveals that any person, including the complainant, has abused the policy by lodging a knowingly false or frivolous complaint by fabricating facts, by failing to tell the truth, or by knowingly omitting important facts, Meridian may take appropriate disciplinary and/or other corrective action.

NOTICE OF GRIEVANCE PROCEDURES

Any Meridian employee or other member of Meridian community—including parents and vendors who believes that he or she has a complaint not covered by Meridian's Anti-Harassment and Discrimination policies may submit a complaint pursuant to Meridian Grievance Procedures. A copy of the grievance procedures and Grievance Complaint Form can be obtained by request through:

Meridian

Attn: Human Resources 2120 13th St NW

Washington, DC 20009



(202) 387-9830

TITLE IX GRIEVANCE PROCEDURES

Any student or parent of student who believes that Meridian has engaged in discrimination and/or harassment on the basis of sex, sexual orientation or gender identity may submit a complaint to the designated Title IX Coordinator identified below. Individuals wishing to submit a Title IX complaint should refer to the “Sexual Harassment or Discrimination Complaint Procedure” contained in this handbook or they may contain the following individual directly:

Director of Operations Meridian 2120 13th Street, NW Washington, DC 20009

(202) 387-9830

504 GRIEVANCE PROCEDURE

Any person who believes that Meridian has engaged in discrimination and/or harassment on the basis of a disability may submit a complaint to the designated individuals below:

For complaints involving students who attend Meridian:

Donna Defino, Director of Student Support Meridian

2120 13th Street, NW Washington, DC 20009

(202) 387-9830

Complaints involving employees of Meridian may be submitted to:

Jeff Cooper, Acting COO Meridian

2120 13th Street, NW Washington, DC 20020

(202) 387-9830

GRIEVANCE PROCEDURE

The grievance procedures outlined below establish how complaints will be investigated and resolved. These grievance procedures are intended to provide for a prompt and equitable resolution of complaints. These grievance procedures may be used by



employees, students, parents, or third parties. These grievance procedures do not bar individuals from filing claims in other forums to the extent permitted by state or federal law. Meridian encourages individuals to discuss their concerns with appropriate School officials before resorting to a formal complaint. However, individuals are not required to do so before filing a formal complaint.

Meridian prohibits retaliation against individuals who file a complaint or participate in a complaint investigation.

A formal complaint may be filed by following the steps outlined below:

Step 1

Within ninety (90) days of the alleged discrimination or harassment, written notice of the complaint must be filed with the individual designated above. Complainants may request the complaint form from Human Resources. The written notice must include the nature of the complaint, the date(s) of the occurrence, the desired result, and must be signed and dated by the person making the complaint.

Upon receipt of the written notice of the complaint, the designated individual to whom the complaint was submitted will timely initiate an adequate, reliable and impartial investigation of the complaint. Each investigation will include, as necessary, interviewing witnesses, obtaining documents and allowing parties to present evidence. All documentation related to the investigation will remain confidential to the extent practicable and allowable by law.

Within fourteen (14) business days of receiving the written notice of the complaint, the individual investigating the complaint will respond in writing to the complainant with an update on the status of the investigation. When a resolution is reached, the individual investigating the complaint will provide a written response to the complainant. The response will summarize the course and outcome of the investigation. If, as a result of the investigation, it is determined that discrimination or harassment have occurred, appropriate corrective and remedial action will be taken.

Step 2



If the complainant wishes to appeal the decision from Step 1, he/she may submit a signed statement of appeal to the Head of School within ten (10) business days after receipt of the response. The Head of School will review all relevant information and meet with the parties involved, as necessary. Within fourteen business days of receiving the statement of appeal, the Head of School will respond in writing to the complainant summarizing the outcome of the appeal.

Meridian

Attn: Matthew McCrea, Head of School

2120 13th Street, NW Washington, DC 20020

(202) 387-9830

Step 3

If the complainant is not satisfied with the decision of the Head of School, he/she may appeal through a signed written statement to Meridian's Board of Trustees within ten (10) business days of the receipt of the Head of School's response. In an attempt to resolve the grievance, the Board shall review all relevant information and meet with the concerned parties and their representatives within thirty (30) days of the receipt of such an appeal. A copy of the Board's disposition of the appeal shall be sent to each concerned party within a reasonable time following the appeal meeting by the Board.

Meridian

Attn: Chair, Board of Trustees 2120 13th Street, NW Washington, DC 20020

meridianboard@meridian-dc.org

Any complainant may file a complaint with the Office for Civil Rights at any time before or during the grievance procedures. The regional office for the District of Columbia is located at 400 Maryland Avenue, SW, Washington, DC 20020 and can be reached at (202) 453-6020 (ph), (202) 453-6021 (fax).

Whistle-Blower Policy



Meridian is committed to maintaining a workplace where employees are free to raise good faith concerns regarding the School's business practices, specifically: reporting suspected violations of law on the part of the School, including but not limited to federal laws and regulations;

- 1) providing truthful information in connection with an inquiry or investigation by a court, agency, law enforcement, or other governmental body; and
- 2) identifying potential violations of Meridian policy, specifically the policies contained in the

School's Faculty & Staff Handbook or this Employee Manual.

Meridian expressly prohibits any form of retaliation, including harassment, intimidation, adverse employment actions, or any other form of retaliation, against employees who raise in good faith suspected violations of law, cooperate in inquiries or investigations, or in good faith identify potential violations of School policies. Any employee who engages in retaliation will be subject to disciplinary action.

Detailed procedures for reporting and resolving issues at the School—including issues covered by this policy—appear under "Grievance Procedure." In addition, any employee who wishes to report a suspected violation of law or policy may:

- report it to her or his supervisor;
- report it to the next level of management if the issue involves a supervisor;
- report issues anonymously to the mailbox of the Head of School, Human Resources, the Chief Operating Officer or the Chair of the Board of Trustees himself/herself or others. If so, the employee shall not be permitted to work while undergoing such treatment.

Policy Violations

For any violation of this Drug and Alcohol Policy (including, without limitation, the unlawful manufacture, distribution, dispensation, possession, use or misuse of illegal drugs, alcohol, or controlled substances on Meridian's premises or while on Meridian business), Meridian, in its sole discretion, may subject the offending employee to disciplinary action up to and including immediate termination of employment.



Workplace Violence Prevention Policy

Meridian is committed to preventing workplace violence and to maintaining a safe work environment. Meridian has adopted the following guidelines to deal with intimidation, harassment, or other threats of or actual violence that may occur on-site or off-site during work-related activities.

Scope of Policy

All full-time and part-time, active employees are covered under this policy. It also applies to contractors, volunteers, and any other adults serving Meridian to the full extent to which the School can reasonably enforce the policy with non-employees. By way of example only, employees should report any threatening behavior by adults serving at Meridian—even if they are not employed by the School to the Head of School—and, where warranted and applicable under this policy, Meridian will suspend the employee's, contractor's, volunteer's, or other adult's service at the School, if warranted, pending investigation (per the policy below).

Procedures

All employees, students, parents, vendors, business associates, and other stakeholders should be treated with courtesy and respect at all times. Employees must refrain from fighting, "horseplay," or other conduct that may be dangerous or threatening to the safety of others.

Conduct that threatens, intimidates, or coerces another employee, student, parent, vendor, business associate, or other stakeholder will not be tolerated. Meridian resources may not be used to threaten, stalk, or harass anyone at the workplace or outside of the workplace. Meridian treats threats coming from an abusive personal relationship as it does other forms of violence and any such conduct will be subject to appropriate corrective action, up to and including termination and/or removal from School premises.

Indirect or direct threats of violence, incidents of actual violence, and suspicious individuals or activities should be reported as soon as possible to a supervisor, security personnel, members of Meridian leadership team, Head of School or Human Resources. When reporting a threat or incident of violence, the employee should be as specific and detailed as possible. Employees should never place themselves in peril, nor should they attempt to intercede during an incident (unless their role at the School, their training, and other School policies require and have prepared them to intervene).

Employees should promptly inform the Head of School (or the Chief Operating Officer in the Head of School's absence) and Human Resources of any protective or restraining order that they have obtained that lists the workplace as a protected area. Employees are encouraged to



report safety concerns with regard to intimate partner violence. Meridian will not retaliate against employees making good-faith reports.

Meridian will promptly and thoroughly investigate all reports of threats of violence or incidents of actual violence and of suspicious individuals or activities. The identity of the individual making a report will be protected as much as possible and as practicable under the circumstances. Meridian will not retaliate against employees making good-faith reports of violence, threats or suspicious individuals or activities. In order to maintain workplace safety and the integrity of its investigation, Meridian may immediately suspend employees, contractors, or volunteers suspected of workplace violence or threats of violence, either with or without pay, pending further investigation. Employees or others suspended for alleged violation of this policy shall not have any access to students, faculty, staff, contractors, or other stakeholders, nor shall they be allowed on Meridian's premises or at School activities.

Anyone found to be responsible for threats of or actual violence or other conduct that is in violation of this policy will be subject to prompt disciplinary action up to and including termination of employment or (in the case of a contractor or volunteer) termination of service at and access to the School as well as its students and staff.

If the School's life insurance carrier or other provider offers an Employee Assistance Program (EAP), an employee found responsible for threats of or acts of violence may self-refer to that program, or the School may refer the employee to the EAP as either an optional step or as a condition of disciplinary action up to and including continued employment. Participation in such a program, however, will not replace or exempt an employee from additional disciplinary action.

Meridian encourages employees to bring disputes to the attention of their supervisors or the Head of School before the situations escalate. Meridian will not discipline employees for raising such concerns in good faith

Information—including the outcome and findings of any investigation into the alleged child sexual misconduct and abuse--if contacted by any Local Education Agency ("LEA") or other School that is considering the current/former Meridian employee for prospective employment. Additionally, it is strictly prohibited for any Meridian employee to assist any current/former employee in obtaining employment involving direct interaction with minors if it is known or reasonably suspected that such individual has engaged in child sexual misconduct or abuse in violation of D.C. or federal law.



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