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Education. Evolved.

HARASSMENT & DISCRIMINATION POLICY

Pod education is a new journey for everyone, and we will evolve away from past foundations that created divides to begin a fresh start free from discrimination and harassment. Pod Connection, Inc. employees, contractors, parents, vendors, sponsors, and donors should understand, without having to be asked or told, that each person is unique and individual in their own way. Where appropriate those differences should merit appreciation.

It should be clear that under no circumstances will Pod Connection, Inc. tolerate harassment or discrimination related to race, religion, creed, color, national origin, sex, pregnancy, sexual orientation, gender identity, age, ancestry, physical or mental disability, genetic information, marital status or any other classification protected by applicable local, state or federal law.

This policy extends to parents, employees, contractors, partners, sponsors, and vendors. Zero tolerance for discrimination or harassment should be more than a policy in our Pod Network. It should be a heart-felt approach to humanity.

Any member of the Pod Connection, Inc. business network including, but not limited to, owners, employees, contractors, parents, vendors, sponsors, and donors may be asked to periodically participate in Anti-Harassment and Discrimination Training, according to their business relationship with the Company. Teachers and contractors will be required to do complete an online interactive training video upon Enrollment Offer / Services Agreement(s). All Pod Connection, Inc. Network affiliates may receive emails, videos, quizzes, or other digital forms of periodic anti-harassment and discrimination notices (4 – 12 per year depending on business relationship). Failure to participate in such training in a reasonable amount of time, will relieve Pod Connection, Inc. of any previously agreed upon notice period, and termination of the relationship will be immediate.

Equal Opportunity & Americans with Disabilities Act

It is the policy of the Pod Connection, Inc. to provide equal opportunities to all students, families, employees, contractors, location hosts, and related applicants without regard to unlawful and unethical considerations of race, religion, creed, color, national origin, sex, pregnancy, sexual orientation, gender identity, age, ancestry, physical or mental disability, genetic information, marital status or any other classification protected by applicable local, state or federal laws. This policy prohibits unlawful and unethical discrimination based on the perception that anyone has any of those characteristics, or is associated with a person who has or is perceived as having any of those characteristics. This policy applies to all aspects of business operations, including, but not limited to, student matching to Pods, hiring, job assignment,



working conditions, compensation, promotion, benefits, scheduling, training, discipline and termination.

Pod Connection, Inc. expects all business affiliates to support our equal employment opportunity policy, and to take all steps necessary to maintain a workplace and educational place free from unlawful and unethical discrimination and harassment and to accommodate others in line with this policy to the fullest extent required by law.

Moreover, in compliance with the Americans with Disabilities Act (ADA), and respect for those covered under the Act, Pod Connection, Inc. provides reasonable accommodations to individuals conducting business with Pod Connection, Inc. with disabilities to the fullest extent required by law and reasonably available to Pod Connection, Inc. Accommodations may require medical certification of both the disability guidance from a physician to understand appropriate accommodations. Keep in mind that Pod Connection, Inc. can only seek to accommodate the known physical or mental limitations of an otherwise qualified individual. Therefore, individuals are encouraged to communicate with Pod Connection, Inc. and should expect empathy and genuine care if you are in need of an accommodation. Pod Connection, Inc. will engage in an interactive process with the individual to identify possible accommodations, if any will help to enhance the educational value provided to Pod Students.

Anti- Harassment and Discrimination

Pod Connection, Inc. is committed to providing a work environment free of sexual or any form of unlawful and unethical harassment or discrimination. Harassment or unlawful discrimination against individuals on the basis of race, religion, creed, color, national origin, sex, pregnancy, sexual orientation, gender identity, age, ancestry, physical or mental disability, genetic information, marital status or any other classification protected by local, state or federal laws is illegal and prohibited by Company policy. Such conduct by or towards any employee, contract worker, customer, vendor or anyone else who does business with the Pod Connection, Inc. will not be tolerated. Any employee or contract worker who violates this policy will be subject to disciplinary action, up to and including termination of his or her employment or engagement. To the extent a customer, vendor or other person with whom the Company does business engages in unlawful harassment or discrimination, the Company will take appropriate corrective action up to and including terminating business relationships.

Prohibited Conduct:

Prohibited harassment or discrimination includes (but is not limited to) any verbal, physical or visual conduct based on race, religion, creed, color, national origin, sex, pregnancy, sexual orientation, gender identity, age, ancestry, physical or mental disability, genetic information, marital status or any other classification protected by local, state or federal laws or any other legally protected basis if:

a. submission to such conduct is made either explicitly or implicitly a term for engaging in a business relationship with Pod Connection, Inc.



b. submission to or rejection of such conduct by an individual is used as a basis for decisions concerning that individual's ability to engage in a business relationship with Pod Connection, Inc.; or

c. it creates a hostile or offensive work, learning, or business environment.

Prohibited harassment includes (but is not limited to) unwelcome sexual advances, requests for sexual favors and lewd, vulgar or obscene remarks, jokes, posters or cartoons, and any unwelcome touching, pinching or other physical contact. Other forms of unlawful and unethical harassment or discrimination may include racial epithets, slurs and derogatory remarks, stereotypes, jokes, posters or cartoons based on race, national origin, age, disability, marital status or other legally protected categories. Prohibited harassment might also be transmitted using the Company's electronic communications system, or through other on-line conduct.

Complaint Procedure:

Anyone engaged in business with Pod Connection, Inc. who feels that they have been harassed or discriminated against, or who witness any harassment or discrimination by an employee, contract worker, customer, vendor or anyone else who does business with the Company, should immediately report such conduct to hschmidt@pod-connection.com. If the individual does not feel comfortable reporting such conduct to Heather Schmidt, then they may submit an anonymous report at www.lighthouse-services.com/pod-connection.

Do not allow an inappropriate situation to continue by not reporting it, regardless of who is creating the situation. No employee, contract worker, customer, vendor or other person who does business with this organization is exempt from the prohibitions in this policy. In response to every complaint, the Pod Connection, Inc. will conduct an investigation which may involve interviewing witnesses if warranted and, if improper conduct is found, take appropriate corrective action.

To the extent that an individual is not satisfied with the Company's handling of a harassment or discrimination complaint, he or she may also contact the appropriate state or federal enforcement agency for legal relief.

