

IMAGINE SCHOOLS, INC.

GRIEVANCE POLICY AND PROCEDURE

It is the policy of Imagine Schools that all employees, students, parents, and visitors have the right to voice their complaints, grievances, or concerns about matters pertaining to its schools.

Imagine recognizes the meaningful value and importance of full discussion in resolving misunderstandings and in preserving good relations between management and employees. Accordingly, the following grievance procedure should be employed to ensure that complaints receive full consideration.

1. What May Be Grieved

The Imagine Schools grievance process should be used as follows: (1) to deal with complaints and concerns pertaining to educational environment, employment arrangements, or interpersonal conflicts; and (2) to resolve complaints of discrimination and harassment based upon race, color, religion, marital status, sex, national origin, age, disability, genetic information, veteran status, sexual orientation, or otherwise.

2. Who May Grieve

The procedures set forth below may be used by grievants who are employees, students, parents, or visitors.

3. Other Remedies

The existence of this procedure does not bar grievants from also filing claims in other forums to the extent permitted by state or federal law.

5. Informal Grievance

Because most difficulties can be resolved by communicating a concern to someone, grievants are encouraged to discuss their concern or harassment complaint promptly and candidly with their immediate supervisor, the school principal, or the Regional Director.

The grievant is not required to discuss his or her complaint with the alleged harasser or perpetrator in any manner or for any reason prior to initiating a formal grievance.

6. Formal Grievance

Within ninety (90) days of encountering the harassment, discrimination, or complaint that is the subject of the grievance, a grievant shall file a written notice with the school principal or with the

Regional Director. Grievants may use the Grievance Form, that is attached hereto and is also available online from the school website, the Imagine intranet (for employees only), or from the school principal or Regional Director. The written notice shall identify the nature of the complaint and the date(s) of the occurrence; in addition, the notice must be signed and dated by the person filing the grievance. In the event a grievance is being filed by the legal guardian or parent of a student, the student and the legal guardian and/or parent shall sign and date the grievance. The principal and the Regional Director can be reached at the contact information provided below.

The Principal or Regional Director will immediately initiate an adequate, reliable, impartial investigation of the grievance. Each formal complaint will be investigated, and depending on the facts involved in each situation, will be decided after receiving information from the appropriate individuals. Each investigation will include interviewing witnesses, obtaining documentation, and allowing parties to present evidence.

Within thirty (30) business days of receiving the written notice, the Principal or Regional Director shall respond in writing to the grievant (the "Response"). The Response shall summarize the course of the investigation, determine the validity of the grievance, and recommend the appropriate resolution.

If, as a result of the investigation, a valid grievance or harassment is established, appropriate corrective and remedial action will be taken.

7. Appeals

If the grievant is not satisfied with the Response, the grievant may appeal in writing to the Imagine Legal Department (or designee) within thirty (30) days of the date of the Response summarizing the outcome of the investigation. The written appeal must contain all written documentation from the initial grievance and the grievant's reasons for not accepting the Response. The appeal, in letter form, may be sent to: Imagine Legal Department, 1005 N. Glebe Road, Arlington, Virginia 22201.

Within fifteen (15) days from receiving the written appeal, the Legal Department (or designee) will respond in writing to the appellant as to the action to be taken and the reasons for the decision.

8. Prohibition Against Retaliation

Imagine pledges that it will not retaliate against any person who files a complaint in accordance with this policy, or any person who participates in proceedings related to this policy.

In addition, Imagine will not tolerate any form of retaliation against any person who makes a good faith report or complaint about perceived acts of harassment, discrimination, or a concern, or who cooperates in an investigation of harassment, discrimination, or a concern. Any person who is found to be engaging in any kind of retaliation will be subject to appropriate disciplinary action.

9. Modification

Imagine may approve modification of the foregoing procedures in a particular case if the modification (a) is for good cause, and (b) does not violate due process rights or policies of Imagine.

10. Contact Information

Principal: <u>Steve Black</u>	Regional Director: <u>Kathy Helean</u>
Address: <u>2757 Sycamore Street</u>	Address: <u>10535 Portal Crossing</u>
<u>North Port, Florida 34289</u>	<u>Bradenton, Florida 34211</u>
Phone No.: <u>941-426-2050</u>	Phone No.: <u>941-726-9081</u>

Imagine Legal Department:
1005 N. Glebe Road
Arlington, Virginia 22201
Phone: 703.527.2600