



Stride, Inc. Employee Handbook

This handbook is a guideline and not a contract. The policies and benefits contained in this book may be updated or changed by the employer at any time.

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WELCOME!

Stride, Inc. is a dynamic and rewarding environment in which to work. We are a company with great people and an incredible mission to remove barriers that limit anyone from reaching their full potential. Whether you have just joined our staff or have been at the Company for a while, we are confident that you will find our company to be a place of collaboration and teamwork. We strive to continuously enhance Stride as a company in which individual excellence is celebrated and a sense of community is genuine and present.

There are several important things to keep in mind regarding this handbook. First, it contains only general information and guidelines. It is not intended to be comprehensive or to address all of the possible applications of, or exceptions to, the general policies and procedures described. For that reason, if you have any questions or are unsure about any policy or procedure, please ask your manager, Human Resources or any Company executive. Second, please treat the contents of this handbook as Company confidential. Third, Stride is a growing organization and it, therefore, reserves the right to change the content of the handbook from time to time. These changes may be communicated by e-mail from authorized personnel or through other means. Finally, any of the policies and procedures contained within this handbook is not intended to be contractual in nature and Stride employees should not construe them as such.

Thank you for choosing Stride as your choice of work experience. We hope that our company is much more than a job and supports both your personal and professional career aspirations. Please know the great degree to which the Company values the many and diverse talents of its most valued resources – its employees. This handbook has been written to serve as the guide for the employer/employee relationship and we hope that you find it useful.

Your Stride Human Resources Team

May 2022

MISSION

We help learners of all ages reach their full potential through inspired teaching and personalized learning.

DEFINITIONS

- The term "employee" as used throughout this handbook means the employees of Stride, Inc. or any of its subsidiaries.
- The term "employment" as used throughout this handbook means your employment with Stride, Inc. or one of its subsidiaries.
- The term "Company" as used throughout this handbook means Stride, Inc. and its subsidiaries

The Company strives to maintain a positive work environment where employees respect the personal rights and property of fellow employees and meet reasonable standards of work performance. Employees are expected to be courteous and professional to fellow employees, clients, vendors, visitors, and anyone else with whom they come in contact while conducting business.

The Company may, at its sole discretion, take any appropriate corrective action up to and including immediate termination of employment, depending on the circumstances of the situation.

Neither this, anything else in this manual, nor any statement (whether written or oral, express or implied) in any way changes or alter the "at-will" employment relationship. Either the Company or the employee has the right to terminate the relationship at any time for any or no reason, with or without notice.

EQUAL EMPLOYMENT OPPORTUNITY POLICY

Stride provides equal employment opportunities to all employees and applicants, without regard to race, color, religion, national origin, citizenship status, pregnancy, disability, age, genetic information, military status or status as a Vietnam-era or special disabled veteran, marital status, civil union or registered domestic partner status, sex, gender expression, gender identity, sexual orientation or bankruptcy in accordance with applicable federal, state and local laws. In addition, Stride complies with applicable state and local laws governing nondiscrimination in employment in every location in which Stride has facilities. This policy applies to all terms and conditions of employment, including, but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

LABOR LAW POSTERS

Remote employees may access labor law posters on Stride's intranet Human Resources tab in the Shared Documents folder. Employees can search by their state, city, and county of residence to find local and federal labor law posting notices. Employees may also access a copy of a local labor law poster at Stride's physical site locations. Stride's site leaders, such as the senior leader and/or any on-site human resource employee, are responsible for ensuring mandatory labor law posters are displayed prominently where employees can see the posters, such as in the employee breakroom. Site leaders can request updated copies of these posters by emailing HRCompliance@k12.com.

AMERICANS WITH DISABILITIES ACT (ADA)

The Americans with Disabilities Act (ADA) requires an employer to provide reasonable accommodations for qualified individuals with disabilities so that the employee is able to perform the essential functions of their job, unless it would cause undue hardship. A reasonable accommodation is any change in the work environment (including a change in a policy or practice) or in the way a job is performed that enables a person with a disability to perform the essential functions of the job or, for applicants, to be considered for the job.

If you require an accommodation, contact MetLife, Stride's ADA Accommodation administrator at 800-858-6506. If you have any questions about ADA or accommodations under ADA submit a ticket to HR Services at

servicedesk.k12.com. Supervisors who become aware of an employee's need or request for an accommodation are required to report that information by submitting a ticket as well.

A Note About Pregnancy.

Pregnancy, by itself, is not considered to be a disability under the ADA. However, pregnancy related disabilities may be eligible for a reasonable accommodation under the ADA. In addition, in some states, accommodations may be available for women who need them due to pregnancy or child birth without regard to whether it constitutes a disability. To request an accommodation due to pregnancy or child birth, please follow the same procedures as set forth for seeking an accommodation under the ADA.

RELIGIOUS ACCOMMODATIONS

Stride respects the religious beliefs and practices of all employees and will make, upon request, an accommodation for such observances when a reasonable accommodation is available that does not create an undue hardship on Stride's business.

An employee whose religious beliefs or practices conflicts with the employee's job, work schedule, or with the Company's policy or practice on dress and appearance, or with other aspects of employment and who seeks an religious accommodation must submit a ticket to HR Services at servicedesk.k12.com with a written request for the accommodation to Human Resources (HR). The written request will include the type of religious conflict that exists and the employee's suggested accommodation.

HR will evaluate the request considering whether a work conflict exists due to a sincerely held religious belief or practice and whether an accommodation is available which is reasonable and which would not create an undue hardship on the Company's business. For purposes of this policy an undue hardship is one which would cause more than a minimal cost or burden on Stride's operations.

An accommodation may be, for example, using paid leave or leave without pay, allowing an exception to the dress and appearance code which does not impact safety or uniform requirements, or for other aspects of employment.

HR, the supervisor and employee may meet to discuss the request and decision on an accommodation. If the employee accepts the proposed religious accommodation, the immediate supervisor will implement the decision. If the employee rejects the proposed accommodation, the employee may appeal following the Company's Complaint Resolution policy and procedure.

THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT

HIPAA (Health Insurance Portability and Accountability Act) is a federal law that protects the privacy and security of certain persons' medical records and health information. The law applies only to health care providers, health care plans and other limited categories. Although Stride does not directly provide medical care to any persons, certain information that may be received in connection with Stride's self-insured group health plan may be considered to be Protected Health Information under HIPAA. You can find the policies regarding PHI on the Stride Intranet Human Resource group Benefits section...

CLASSIFICATIONS OF EMPLOYMENT

For purposes of salary administration and eligibility for overtime payments and employment benefits, Stride classifies its employees as follows:

Full-time Regular Employees – Employees hired to work Stride normal, full-time, 30-hour or more workweeks on a regular basis. Such employees may be "exempt" or "non-exempt" as defined below.

Part-time Regular Employees – Employees hired to work fewer than 30 hours per week on a regular basis. Such employees may be "exempt" or "non-exempt" as defined below.

Seasonal Employees – Employees hired into a position for which the customary annual employment with Stride is on a limited, seasonal basis such as a spring, summer or fall term for a period of six (6) months or less.

Non-exempt Employees – Employees who are required to be paid minimum wage and overtime at the federal or

state prescribed wage rate, whichever is higher. Stride management will determine the classifications of employees. **Exempt Employees** – Employees who are not required to be paid minimum wage and overtime, in accordance with applicable federal or state wage and hour laws. Stride management will determine the classifications of employees.

Part-time Intern - A non-exempt student or trainee who works fewer than 30 hours per week on a regular basis at Stride. Position may be short term or long term, and / or may have a defined end date. All interns are paid positions unless approved by human resources and legal.

Full-time Intern - A non-exempt student or trainee who works 30 or more hours per week on a regular basis at Stride. Position may be short term or long term, and / or may have a defined end date. All interns are paid positions unless approved by human resources and legal.

STRIDE HUMAN RESOURCES INTRANET

The HR Intranet was created for employees as a place to find Human Resource related materials and forms. Please visit the Stride Intranet <https://k12inc.sharepoint.com/Groups/HR> to access useful HR Information and documents, including but not limited to: benefits information, the employee handbook, holiday calendar and pay schedule. You can access the Intranet by signing in using your full Company email address and network password. Our HR section is located by clicking the drop-down box on the Groups tab: Groups > Human Resources. If you need immediate assistance, please call 855-512-4748 to speak to an HR Representative or submit a ticket to HR Services at servicedesk.k12.com.

EMPLOYEE FILES

Stride maintains an employee file on each employee. Current employees, except as required by law, may review their employee file upon request and in the presence of Human Resources personnel. If a current employee is interested in reviewing their employee file, submit a ticket to HR Services at servicedesk.k12.com

No information in a employee file will be disclosed to anyone outside the organization without the employee's consent, except as permitted or required by law. Stride reserves the right, at its discretion, to comply with official requests for information by law enforcement, public safety, or government agencies without notice.

You are required to ensure that your personal information is up to date at all times, by logging into the HRIS at www.K12.com/hrportal to update any changes in your telephone number, home address, the individuals to notify in case of an emergency.

EMPLOYMENT VERIFICATION

Requests to verify employment are handled by Stride's third-party vendor, Vault Verify. Stride customarily releases only last title and dates of employment to employers, though some verifications – such as those for mortgages – may require income verification. Vault Verify will confirm employment, income, and social service verifications on behalf of Stride. Current and former employees must grant permission to Vault Verify to release information. Their contact information is:

- Website: www.vaultverify.com
- Company Code: 57050

All requests for Security Clearance Background checks must be submit by ticket to HR Services at servicedesk.k12.com. Former employees can email HR@k12.com. Current and former employees must verify the authenticity of the request. HR will only provide requested information if it has received an authorization for release of information AND a waiver and release of claims with respect to responses signed by the employee on forms acceptable to Stride in its sole discretion. Stride does not participate in interviews for security clearance checks except if required to do so by law or if approved in writing in advance by sending an email to HR Services at hr@k12.com or submitting a ticket to HR Services at servicedesk.k12.com

Employees may, at their option, provide a personal reference. However, providing a reference is NOT within the scope of anyone's job responsibilities or authority on behalf of Stride. References by employees are their own personal

opinions and are not a statement by or representation of Stride.

Some states require that state-certified teachers provide a record of specific courses taught to maintain certification. Stride employees assigned to Stride -powered schools or to Stride's private schools must work directly with their school to provide this record. Learning Solutions (formerly Fuel Education) teachers must contact the Learning Solutions Quality Specialist, or their supervisor for more information on verifying the employee's course assignments for certification renewal.

Teachers and other school staff may be required by state law to obtain disclosures from prior employers regarding allegation(s) of sexual misconduct, or other unprofessional conduct. Stride complies with these requests to the extent required or permitted by state law. Requests to complete these forms must be directed to Stride-powered school leadership and Learning Solutions Quality Specialists who work with Stride HR to complete these forms.

MEDIA INQUIRIES

All media inquiries regarding Stride, its clients, or vendors should be referred to Corporate Communications at 571-353-7778 or 703-436-3273 or press@k12.com. Employees may not identify themselves in the press as either "employees of Stride, Inc." or "employees of a Stride, Inc. operating company" or use the Stride name in any way without first receiving approval from Corporate Communications.

PHOTO RELEASE

Stride, Inc. periodically hosts in person employee events at which photographs may be taken. The Company reserves the right to utilize such photographs for any lawful purpose including, for example, such purposes as publicity, illustration, advertising, etc. These photos, for example, appear in Company official publications such as the Company's annual report, a press release, as well as on the Company's social media accounts.

OPEN-DOOR POLICY

Stride maintains an open-door policy and employees are encouraged to communicate with any and/or all Stride personnel as needed. Any employee may approach any of the management staff on an as-needed basis to address questions, concerns, problems, or other matters. Our expectation is that employees will use good judgment and communicate in a professional manner throughout Stride. In most cases, it would be appropriate for employees first to address questions or concerns with their direct supervisor and then follow up with higher management as needed, taking concerns up to the most senior level of management if necessary. Employees are also encouraged to discuss problems with a Human Resources representative at any time.

PERFORMANCE

We are a high-performance enterprise. We select and hire based upon our values of making an impact on the lives of students and other learners. As such, we expect the best from all our colleagues. In addition to goals, and your job duties we consider the following areas important to your performance.

- **Passion:** Actively engages in supporting Stride's mission, vision and goals; proactively resolves issues; creates novel approaches to solving old problems; seeks out new goals and exceeds them; demonstrates superior stewardship of resources; prioritizes work; shows energy and enthusiasm; acts on opportunities to improve our people, processes or technology; demonstrates and/or creates a sense of urgency with regard to constructive change; displays an ongoing commitment to learning and self-improvement; inspires co-workers to develop, grow and perform optimally; volunteers for special projects; celebrates strength of character and devotion to causes and ideas.
- **Accountability:** Takes responsibility for own actions and decisions; demonstrates commitment to accomplish work in an ethical, efficient and cost-effective manner; takes responsibility for personal and organizational success and failure; takes ownership of own areas of responsibility, as well as goals of team; takes personal responsibility for the quality and timeliness of work, and achieves results with little oversight; holds self and team members accountable to meet deadlines in a positive and constructive way.

- **Courage:** Identifies new, innovative and different approaches or solutions to situations, problems and opportunities; listens to, anticipates, monitors and meets the needs of customers (internal and external) and engages with them in an appropriate manner; remains effective in the face of significant and/or long term obstacles; addresses difficult situations through crucial conversations; understands the value of continuous improvement; takes calculated risk while continuing to respect the future needs of the organization and legal requirements; sees the larger picture; willing to sacrifice personal goals for the greater good; seeks out, and listens to opposing views; rises to the challenge of changing business needs, conditions, and work responsibilities with determination and an open mind.
- **Trustworthy:** Earns others' trust and respect through consistent honesty and professionalism in all interactions; tells the truth even when it is difficult; shares information accurately, completely and appropriately; follows through on assignments and commitments; supports Stride's goals and initiatives; adheres to all policies and procedures; uses knowledge wisely; works to prevent breaches in confidence and stops rumors; takes action to correct mistakes and helps others learn from them; gives credit to others and does the right thing when no one is watching.
- **Diversity and Inclusion:** Respects, values, and works to bridge differences by engaging others who have experiences different from their own. Creates an inclusive environment by encouraging contributions from all individuals and initiatives courageous conversation around conscious and unconscious bias. Actively seeks to cultivate Stride's Community of Belonging by respectfully listening and encouraging other perspectives, concerns, and lived experiences. Displays empathy for marginalized populations and looks for ways to build awareness and education in support of these communities.

In addition, we have the following performance expectations of our managers:

- **Developmental Focus:** Provides timely guidance and feedback to team members; delegates appropriate and challenging work to team; creates opportunity for others to obtain new knowledge, skills and behaviors; understands what motivates team members and uses that knowledge to appropriately recognize and empower team members; creates a climate that is open to new and innovative ideas; inspires employees to develop and grow; sees differences as a strength; encourages constructive differences of opinions and healthy debate; initiates and nurtures an information sharing environment; celebrates initiative and action, making first attempts, pursuing pioneering efforts, stepping up to the plate and learning from mistakes.
- **Organizational Ability:** Builds commitment in others for their individual/team/company objectives; teaches others about the business and what drives its competitive advantage; provides vision to help others see how the group's work fits into the big picture; makes decisions that reflect an understanding of the needs of Stride, Inc.; anticipates potential problems and plans accordingly; accomplishes task through formal and informal channels and networks; models behaviors expected of others and applies consistently across the team; champions decisions and links successes to results; perpetuates thinking and acting as a team to deliver results.

To ensure that our expectations are communicated, and that feedback is provided fairly and consistently, Stride always relies upon both managers and employees to understand their roles in the process and to keep the lines of communication open, including formal and informal feedback throughout the year. The Company's performance cycle is July 1st – June 30th. The cornerstone of any performance management program is open communication and regular feedback.

Supervisors and employees should discuss job performance and goals on an informal, routine basis. Timely and regular feedback is key to successful working relationships. Managers are expected to regularly communicate how well employees are meeting expectations in their current jobs, to clarify job responsibilities, and to review progress on goals. If employees have questions or concerns about performance, they should take the initiative to ask their supervisors to discuss their concerns as they occur. We document performance annually via an employee-driven development process. This process provides employees and their supervisors with the tools to discuss, explore, and document plans for improvement and advancement.

EMPLOYMENT AT WILL

All employment at Stride, Inc. is "at will," as governed by the law of the state where the employee works. Either party has the right to terminate the relationship at any time for any reason, with or without notice. Stride also retains its discretion to make all other decisions concerning employees, including such items as demotions, transfers, job responsibilities, increases or reductions in salary, bonuses, other compensation, or any other decision by management with or without cause or notice. The "at-will" nature of employment with Stride is one aspect of employment that cannot

be changed except in writing and signed by an authorized Officer of Stride.

Nothing in Stride's policies is intended to create a contract of any sort on the part of Stride or any of its employees, officers, directors, or agents for employment in other than an at-will status. Nothing in this policy manual nullifies, modifies or interprets the terms of the Employee Confidentiality, Proprietary Rights, and Non-Solicitation Agreement, and the Agreement to Arbitrate.

TERMINATION OF EMPLOYMENT

An employee may be separated from employment voluntarily or involuntarily by retirement, resignation, lack of work, or termination. Whether a termination is voluntary or involuntary, supervisors must bear in mind that each termination may involve consideration of unique facts or circumstances. Prior to taking any action regarding termination by Stride, Inc. the supervisor must first consult with the Human Resources Department to assess the circumstances and appropriateness of termination. All termination decisions must always be made in a manner consistent with applicable federal, state and local laws, and only after approval of one level of management above the supervisor recommending the termination, and a Human Resources Director or the Senior Vice President of Human Resources.

When appropriate, Stride may consider a development plan, a performance improvement plan or other appropriate action prior to terminating an employee. However, Stride has the right to terminate an employee without using one or any of these methods.

Stride has the right to terminate an employee for any or no reason and specifically reserves the right to terminate an employee immediately when there is a basis for believing that the employee has engaged in conduct that Stride considers serious and unacceptable.

Employees whose employment terminates due to lack of work or who otherwise lose their job due to no fault of their own may be eligible for unemployment compensation, subject to applicable state unemployment laws. It is the responsibility of the terminated employee to file his or her unemployment compensation claim.

Resignation

Any employee who voluntarily resigns is expected to provide Stride with advance written notice of no less than two weeks, as is customarily done as a business courtesy. Managers of resigning employees must notify Human Resources of the resignation, and ensure that the departing employee's systems access is removed upon their last date of employment or when access is no longer required for the employee's position.

Upon receipt of the written notice, Stride reserves the right to accept the resignation as well as deciding the effective date of resignation, which may be earlier than the employee's stated date. An employee's resignation date is their actual last day worked. Vacation, sick, or personal time or a Company holiday may not be used to extend a resignation date. Employees will be paid for all hours worked. An employee who receives a wage overpayment is required to pay it back in accordance with state regulations. Employees will accrue benefits (where applicable), up to and including the date of termination, but not extend beyond the date last worked.

Exit Interviews

Stride asks departing employees to complete an online exit survey. Your HR Business Partner will provide you instructions on how to access the survey form. Feel free to schedule time with your HR Business Partner if you prefer to have an exit interview.

Return of Stride Property

All Stride equipment and property (and, if you were employed to work at a school, all of the school's equipment and property) and all confidential and proprietary information and all confidential and proprietary information must be returned at the time of your termination. "Property" includes, but is not limited to, software, computer equipment, swipe cards, keys, parking passes, company credit cards, hard-copy files, electronic files, data compilations, correspondence, calendar appointments and responses, e-mails (including attachments), voice mails, education records (as defined in the Family Educational Rights and Privacy Act), images, video files, video-conference records, personal working files and notes, text messages, and electronic messages sent or received via electronic messaging applications, without regard to whether such items (tangible or intangible) are located at your home, off-site storage, personal or work computers, cell phones, laptops, tablets, and desktops, "cloud" storage, network storage, portable hard drives, disks, CD-ROM, flash drives, personal e-mail accounts, personal software and app accounts, personal

phone accounts or any other location. No one is authorized to continue to retain or use any such items after termination becomes effective. Failure to comply with this requirement may result in criminal and/or civil liability. The employee will be responsible for any lost or damaged items. Corporate employees should open a ticket with IT to request mailing labels to return equipment (<https://servicedesk.k12.com/support>). School employees will receive an email from your school contact with return UPS mailing labels. Please reach out to your manager if you do not receive them before your final day. Enrollment center employees will be contacted by the Stride Reclamations Team for instructions on returning your equipment.

STRIDE REHIRE POLICY

Rehire is to hire a former employee again. In the event the employee leaves Stride and returns within one year of the termination date, prior service will be recognized and reflected in an adjusted calculated seniority date. If previous employees return to Stride after the specified one-year period, they will not receive credit for such prior service.

Employee referral bonuses are not paid for rehires of former employees.

Rehire of employees affected by position elimination, layoff, or restructuring must be approved by the SVP, Human Resources and CEO for a period of one year following the employee's date of termination.

Similarly, former employees affected by position elimination, layoff, or restructuring cannot engage in employment as a contractor performing work for Stride or one of its subsidiaries, an independent consultant, or a company engaged in a joint venture with Stride for a period of one year after their date of termination without the approval of the SVP, Human Resources and CEO. All such situations will be evaluated based upon available facts and circumstances.

If engaging a former employee who previously resigned within six months as a contractor, HR leadership approval is required.

STRIDE-POWERED SCHOOL TEACHER SPRING, SUMMER, AND WINTER BREAK AND BONUS PAYMENT POLICY

All school-based employees – including Teachers - who follow a school calendar have a Summer, Winter, and/or Spring Break as designated by the school. These school-based employees do not see these break periods tracked as Paid Time Off (PTO) in UltiPro because the break is a company holiday for those school-based employees.

To assist Stride, Inc. in staff planning for the coming school year, teachers are to provide their supervisor and Human Resources Business Partner ("HRBP") with written notice no later than May 1 that the employee is resigning effective no later than the last date of the upcoming Summer Break period.

In this policy, a "Teacher" is any Stride employee whose job title is either Teacher or Special Education Teacher, Lead and/or Master Teacher and whose offer letter or memorandum transferring the person for or to the current teacher position notes that the person is eligible for Summer Break and/or a discretionary bonus. Teachers for Learning Solutions (formerly FuelEd) customers and Stride private schools are not included within this policy. An "academic year" begins at the start of the fall semester and ends on the last day of the immediately following spring semester.

Resigning Teacher employees under this section will receive Summer Break pay only when that employee meets all of the following requirements:

- The employee provides written notice on, or before this section's deadline.
- The employee remains employed until the last day for job responsibilities to be completed for the then-current academic year.
- The employee returns all equipment, records, and documents (other than employment documents) to the Company no later than five days after the academic year's job responsibilities end.

This Summer Break pay is paid over the Break period up to, but not for any dates after, the resignation effective date.

Teachers must be active employees to receive any Spring or Winter Break holiday pay.

Eligible employees may receive a discretionary bonus – even when not employed on the date of payout – only if there is a combination of successful completion of performance objectives by the individual employee, the school, and the Company.

Teachers for a Stride-powered school program who are notified by management that their position is being eliminated at the end of the academic year due to a layoff or reduction in force are not eligible to receive Summer Break and/or discretionary bonus.

Note: Notwithstanding the above, if a Stride-powered school program ends at the conclusion of an academic year or if Stride-employed teachers will not be employed for a Stride managed school program after the conclusion of an academic year, in each case regardless of the reason, then the Stride-employed teachers for that Stride managed school program will not be eligible for part or all of their Summer Break.

This policy does not change the at-will employment status of any teacher. Teachers terminated for cause (such as, but not limited to, due to performance or conduct issues) at any time are not eligible to receive either the Summer Break or the discretionary bonus.

This policy is not a guarantee that a discretionary bonus will be issued to employees or, if so, of any particular amount.

CODE OF BUSINESS CONDUCT AND ETHICS

Note: The entire Code of Business Conduct and Ethics Policy should be read by every employee and can be found on the HR Portal. You are responsible for knowing the policy and acting in accordance with it.

The Code of Business Conduct and Ethics contains general guidelines for conducting the business of Stride Inc. (the “Company”) consistent with the highest standards of business ethics. The Code applies to all of our employees. To the extent the Code requires a higher standard than required by commercial practice, applicable laws, rules or regulations, or any provision of this handbook we adhere to these higher standards. Furthermore, the Company is committed to maintaining a workplace that is free from harassment, discrimination, violence, and the use and presence of illegal substances. Therefore, you are encouraged to familiarize yourself with those sections of this Employee Handbook which prohibits this behavior and to which you are also subject.

The Code requires that employees disclose any conflicts of interest to their supervisor or to the Legal department. Among the types of situations in which a conflict of interest may exist are outside employment, personal benefits received as a result of employment with Stride, financial interests in or loans from customers, suppliers or competitors of Stride, service on boards or committees, and actions by an employee’s family members.

The Code also requires employees to advance the Company’s interests and safeguard confidential information. It further provides that employees should deal fairly with employees, customers, suppliers and competitors, and protect company assets.

The Code provides that employees are not to give gifts to, or receive gifts from, customers or suppliers unless the gift is of nominal or token value, would not be viewed as an inducement to or reward for any business decision, is consistent with customary business practice and does not violate any applicable laws or regulations.

The Code addresses several additional topics. It is important that you know, understand and adhere to all portions of the Code. If you cannot access the Code, contact Human Resources.

GIFTS AND ENTERTAINMENT

The giving and receiving of reasonable and customary gifts and entertainment (such as theatre or game tickets, business meals or a round of golf) are common business courtesies and are designed to build relationships and understanding among business partners. However, it is not always appropriate or advisable to offer or accept them, and you should not be in a position of deriving direct or indirect benefit from anyone dealing with the Company. For example, if accepting a gift or entertainment would compromise, or even appear to compromise, your ability to make objective and fair business decisions, it should politely be declined. Likewise, it would not be appropriate to accept a gift from a vendor who is participating in a competitive contract bidding process. It is never appropriate to accept or

solicit gifts or money, securities or special discounts, or cause another person to do so on your behalf.

It is your responsibility to use good judgment in this area. No employee may give gifts to, or receive gifts from, customers or suppliers unless the gift is of nominal or token value, would not be viewed as an inducement to or reward for any particular business decision, is consistent with customary business practices and does not violate any applicable laws or regulations. Similarly, any meals or entertainment provided to, or accepted from, customers or suppliers should be moderately scaled, not extravagant, infrequent, and within the limits of reasonable and customary business practice. You should not attend activities that would reflect poorly on the Company or violate other provisions in this Code of Conduct. All gifts and entertainment expenses should be properly accounted for on expense reports.

To ensure adherence to the ethical standards reflected in our Code of Conduct, any gifts or entertainment accepted by employees holding the position of senior vice president or above shall be disclosed in writing or electronically to the General Counsel within five (5) business days or as soon as practicable thereafter. Token gifts (e.g., coffee mugs, golf balls and similar promotional items) and business meals with a value of less than \$100 need not be reported. The disclosure shall provide a description of the gift or entertainment received its actual or estimated value, and the identity of the individual and company that provided the gift or entertainment. The actual value should be provided if it is readily available, such as from menu prices or a face ticket amount, or otherwise obtained from the vendor or supplier upon reasonable request. If the actual value of the gift or entertainment cannot be readily obtained, the estimated value should be the fair market value. For example, a disclosure for a gift of an exclusive bottle of wine could be estimated from its retail sales price. The General Counsel will provide the Board of Directors with a consolidated report of such matters at its regular scheduled meetings. Any exceptions to the above limitations for other employees must be pre-approved by the General Counsel.

Gifts and entertainment may not be offered or exchanged under any circumstances to or with any public employee, whether federal, state or local governments, including school boards and school officials, unless made in strict accordance with Section VII herein. If you have any questions about this policy, contact your supervisor or the Legal Department for additional guidance. For a more detailed discussion of special considerations applicable to dealing with federal, state and local government officials, see "Interactions with the Government" in Section VII, noted below.

If you conduct business in other countries, you must be particularly careful that gifts and entertainment are not construed as bribes, kickbacks or other improper payments. See "The Foreign Corrupt Practices Act and Other Laws Governing Our Business Internationally" for a more detailed discussion of our policies regarding giving or receiving gifts related to business transactions in other countries (section IX of the Code of Business Conduct which can be found on the HR Portal.

You should make every effort to refuse or return a gift that is beyond these permissible guidelines. Failure to comply with these guidelines may result in disciplinary actions, up to and including termination of employment. If it would be inappropriate to refuse a gift or you are unable to return a gift, you should promptly report the gift to your supervisor. Your supervisor will bring the gift to the attention of the Legal Department, which may require you to donate the gift to an appropriate community organization. If you have any questions about whether it is permissible to accept a gift or something else of value, contact the Legal Department for additional guidance.

Students and Staff: Gifts, Awards, Scholarships, Fundraising and Raffles

Stride recognizes that staff and students may exchange gifts. Gifts exceeding a nominal or token value (\$25) between a staff member and a student or their parent or guardian must be reported and approved by their Executive Director ("ED.") Examples of gifts exceeding a nominal or token value may include:

- Tickets to a Broadway show from a student
- Creating a scholarship to recognize a student at Stride, or its related entities
- Raising funds for a student scholarship
- Initiating a raffle to raise funds for a student, or parent with cancer

These examples are illustrative, but not exhaustive.

Students cannot be given any gifts or incentive for enrolling or re-enrolling in a Stride-powered school without permission from Stride Legal. An ED who seeks to give, or who receives a gift exceeding a nominal or token value must receive prior approval from their Deputy Regional Vice President before giving or accepting the item(s).

Any gifts to students by staff must be given to all students and all be of equal value.

All fundraising efforts sponsored by the school, and/or using the school's e-mail communications and/or student/family contact information must receive approval from Legal, Tax, and Finance.

Note: Interactions with the Government

The Company conducts business with the U.S., state and local governments and the governments of other countries. It is important to remember that the "government" is a broad term and also extends to other public entities and their employees including, but not limited to, school districts, intermediate school districts, charter schools and boards of cooperative educational services. The Company is committed to conducting its business with all governments and their representatives with the highest standards of business ethics and in compliance with all applicable laws and regulations, including the special requirements that apply to government contracts and government transactions. In your interactions with the government, you should:

Be forthright and candid at all times. No employee should misstate or omit any material information from any written or oral communication with the government.

You should not offer or exchange any gifts, gratuities or favors with, or pay for meals, entertainment, travel or other similar expenses for, government employees. To the extent that state law and school district policies permit such payments or gratuities up to specified limits, but not otherwise, you must obtain the approval of the General Counsel before making any such offers, exchanges, or payments.

If your job responsibilities include interacting with the government, you are expected to understand and comply with the special laws, rules and regulations that apply to your job position, including any local restrictions on providing entertainment and gifts to school officials. In addition, all interactions with government officials in policymaking positions must first be coordinated with the Public Affairs Department to ensure that we are in full compliance with all applicable lobbying disclosure laws and are consistent with Company public policy positions. If any doubt exists about whether a course of action is lawful, you should seek advice immediately from the Legal Department.

EMPLOYEE CONDUCT

Stride strives to maintain a positive work environment where employees are treated with respect and where they respect the personal rights and property of fellow employees. All employees are expected to meet reasonable standards of work performance: Achieving committed goals; meeting deadlines; living the values; having a positive effect on others; and continuously seeking ways to enhance and improve the business.

ANTI-HARASSMENT AND DISCRIMINATION POLICY

It is the policy of Stride to maintain both a working and educational environment that encourage mutual respect, promotes respectful relationships, and is free from all forms of unlawful discrimination, including harassment of any employee, applicant for employment, or student or vendor by anyone, including supervisors, employees (including those in teaching and school administrative positions), co-workers, vendors, or customers. Harassment in any manner or form is expressly prohibited and will not be tolerated by Stride. Accordingly, Company management is committed to vigorously enforcing this policy against discrimination, including but not limited to sexual harassment, at all levels within Stride.

All reported or suspected occurrences of discrimination (including, but not limited to, harassment) will be promptly and thoroughly investigated. Where discrimination is determined to have occurred, Stride will immediately take appropriate disciplinary action, including Written Warnings and possible suspension, and/or termination.

Stride will not permit or condone any acts of retaliation against anyone who files discrimination complaints or cooperates in the investigation of the same.

The term "harassment" includes, but is not limited to, unwelcome slurs; jokes; verbal, graphic, or physical conduct relating to an individual's race, color, religion, sex, national origin, citizenship status, pregnancy, disability, age, genetic information, military status or status as a Vietnam-era or special disabled veteran, marital status, civil union or registered domestic partner status, gender (including gender identity), sexual orientation or bankruptcy in accordance with applicable federal, state and local laws.

Several behaviors that are sexual harassment (for example, unwanted sexual touching, being forced to kiss someone, being forced to have contact with any genital region, sexual assault) can also constitute sexual abuse. Sexual abuse is any sexual contact against a person without that person's consent or against a minor regardless of consent. Sexual abuse, whether against a minor or adult, is strictly prohibited.

Stride prohibits unlawful sexual harassment, as well as retaliation against persons alleging such harassment. The U.S. Equal Employment Opportunity Commission and the U.S. Department of Education's Office of Civil Rights consider sexual harassment to be repeated and unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature. There are two forms of sexual harassment:

- **Quid Pro Quo ("One Thing for Another"):** This may occur where submission to such conduct is made an implicit or explicit term or condition of an individual's employment; or where submission to or rejection of such conduct is used as the basis for decisions about employment, promotion, transfer, selection for training, performance evaluation, etc.
- **Hostile Work Environment:** This may occur where such conduct has the power or effect of creating an intimidating, hostile, or offensive working environment that substantially interferes with an employee's work performance.

Sexual harassment can range from sexual humor and innuendo to physical threats and sexual assault. It may include, but is not limited to, the following behaviors:

- Inappropriate posters, photos or symbols
- Direct or subtle pressure for sexual activity
- Unwelcome brushes or touches
- Physical aggression, such as pinching or patting
- Inappropriate sexual innuendo
- Sexist jokes or remarks
- Obscene gestures or comments
- Telephone calls, emails, text messages, instant messages or blogs

The term "harassment" may also include conduct of employees, supervisors, vendors and/or customers who engage in verbally or physically harassing behavior that has the potential to humiliate or embarrass an employee of Stride.

Complaint Procedure

Any employee who feels that he or she has been or is being harassed, or discriminated against, can immediately inform the alleged harasser that the behavior is unwelcome. In many instances, the person may be unaware that their conduct is offensive and when so advised can easily and willingly correct the conduct so that it does not reoccur.

If an informal discussion with the alleged harasser is unsuccessful in remedying the problem or if such an approach is not desirable or possible, the employee should immediately report the complained-of conduct to their manager, executive, or the Human Resources Department. The report should include all facts available to the employee regarding the harassment.

A third party may also file a complaint of sexual harassment if the sexual conduct of others in the work environment has the purpose or effect of substantially interfering with the third party's welfare, or work performance, thus creating a hostile environment.

Persons who are found to have knowingly made a false report may be subject to disciplinary actions up to and including termination of their relationship with Stride.

Confidentiality

All reports of discrimination will be treated seriously. However, absolute confidentiality is not promised, nor can it be assured. Stride will conduct an investigation of any complaint that will require limited disclosure of pertinent information to certain parties, including the alleged harasser. Stride will follow legal requirements to report sexual abuse against minors and others, which can include reports to law enforcement.

Investigative Procedure

Once a complaint is received, Stride, through the Human resources department, will begin a prompt and thorough investigation. The investigation may include interviews with all involved employees, including the alleged harasser, and any employees who are aware of facts or incidents alleged to have occurred.

In responding to claims of sexual harassment, Stride will judge each claim based on the facts particular to each case. Once the investigation is completed, a determination will be made regarding the validity of the discrimination allegations. If it is determined that harassment has occurred, prompt, remedial action will be taken. This may include some or all of the following steps:

1. Restoring any lost terms, conditions, or benefits of employment to the complaining employee.
2. Disciplining the harasser. This discipline can include written disciplinary warnings, transfer, demotion, suspension, and termination.

If the harassment is from a vendor or customer, Stride will take appropriate action to stop the complained-of conduct.

Duties of Employees and Supervisors

All employees of Stride, both management and non-management, are responsible for assuring that a workplace free of harassment is maintained. Any employee may file a harassment complaint regarding incidents experienced personally or incidents observed in the workplace. Stride strives to maintain a lawful, pleasant work environment where all employees are able to effectively perform their work without interference of any type and requests the assistance of all employees in this effort.

All Stride employees who become aware of actual or alleged sexual abuse against a minor must promptly report it to Human Resources.

All Stride supervisors and managers are expected to adhere to the Stride anti-harassment policy. They are responsible for doing all they can to prevent and discourage harassment from occurring. If a complaint is raised, supervisors and managers are to act promptly and notify the Human Resources Department of the complaint so that Human Resources may proceed with an investigation. If a supervisor or manager fails to follow this policy, he or she will be subject to disciplinary action, up to and including termination.

Colorado Stride-Powered Schools

Employees assigned to Colorado Stride-powered Schools may contact the school's Compliance Coordinator, (at the time of publication: Adelita Shepard), in addition to the other avenues mentioned throughout this handbook. Ms. Shepard can be reached at ColoOps@k12.com or 8601 Turnpike Drive, Suite 100, Westminster, CO 80031. Colorado managed school employees must contact to Ms. Shepard to obtain the process.

GUIDELINES FOR APPROPRIATE CONDUCT

As Stride team members, employees are expected to accept certain responsibilities, follow acceptable business principles in matters of conduct, and exhibit a high degree of integrity at all times. This not only involves sincere respect for the rights and feelings of others, but also demands that employees refrain from any behavior that might be harmful to themselves, co-workers, or Stride or that might be viewed unfavorably by current or potential customers or by the public at large. Employee conduct reflects on Stride. Employees are, consequently, encouraged to observe the highest standards of professionalism at all times.

Types of behavior and conduct that Stride considers inappropriate include, but are not limited to, the following:

- Falsifying employment or other Company records;
- Violating the Stride anti-harassment policy;
- Soliciting or accepting gratuities from customers or clients;
- Excessive absenteeism or tardiness;
- Excessive, unnecessary, or unauthorized use of Company property and supplies, particularly for personal purposes;
- Reporting to work under the influence of drugs or alcohol, and the illegal manufacture, possession, use, sale, distribution, or transportation of drugs;
- Fighting or using obscene, abusive, or threatening language or gestures;
- Theft of property from co-workers, customers, Stride, or the community;

- Unauthorized possession of firearms on Stride premises or while on Company business;
- Disregarding safety or security regulations;
- Insubordination; and
- Failing to maintain the confidentiality of Company, customer, or client information.
- Any other serious misconduct as determined by the Company.

Should an employee's performance, work habits, overall attitude, conduct, or demeanor become unsatisfactory based on violations either of the above or of any other Company policies, rules, or regulations, the employee will be subject to disciplinary action, up to and including immediate termination.

Before or during imposition of any discipline, employees may be given an opportunity to relate their version of the incident or problem at issue and provide any explanation or justification they consider relevant.

Management reserves the right to determine the suitable course of action, up to and including termination.

PROGRESSIVE DISCIPLINE

Here at Stride, Inc. we want you to be successful in your job and we will provide you with the necessary tools, support and guidance. There are times where the performance of an employee does not meet the needs of Stride. Where appropriate, a policy of progressive employee discipline will be followed by supervisors.

Progressive discipline provides managers/supervisors with a consistent and fair process for handling disciplinary issues and protects the legal rights of the employee and employer. Managers/supervisors should contact and work with the HR office when determining the level of discipline, if any, which may be required.

The following steps should be taken for progressive discipline:

Verbal Counseling - The first step in the Stride progressive disciplinary policy is Verbal Counseling. This is an oral warning to an employee that their conduct is unacceptable, and that repeated or continued failure to conform the employee's conduct or performance to Stride standards will result in more severe disciplinary action. A record of the notice of the verbal warning may be made and retained in the employee's file.

Written Warning or Performance Improvement Plan (PIP)- The second step provides employees with written documentation of conduct, or performance issue(s). Conduct concerns are addressed in Written Warnings. Performance concerns are addressed in PIPs. The Company may issue either document when an employee has both performance and conduct issues. A Written Warning or PIP is intended to serve as a formal counseling statement that describes the unacceptable conduct or performance of the employee and specify needed changes or improvements. These documents will:

- Detail the areas of deficiency, specific occurrences, and prior discussions on the topic.
- Provide areas in which an employee must improve their performance, and / or conduct.
- Discuss the importance of this position, or the employee's work within the organization and why a stronger performance is needed.
- Include a timeline for improvement to occur and may involve frequent meetings to measure the progress along the way.
- At the end of the timeline, the performance will be evaluated again, and a determination on next steps will be discussed with the employee.

A copy of the Written Warning or PIP will be retained in the employee's file.

Termination - The final step in the disciplinary procedure is the termination of the employee. If an employee fails to conform their conduct or performance to the standards Stride requires, Stride may, at its sole discretion, terminate the employee's employment.

Exceptions - For serious offenses, such as fighting, theft, insubordination, threats of violence, the sale or possession of drugs or abuse of alcohol on company property, etc., termination may be the first and only disciplinary step taken. Any step or steps of the disciplinary process may be skipped at the discretion of Stride after investigation and analysis of the total situation, past practice, and circumstances. In general, Verbal Counseling (one or several) should, at the

next infraction, be followed by a Written Warning and / or PIP, followed at the next infraction by discharge. This is especially true in those cases where the time interval between offenses is short and the employee demonstrates a poor desire to improve their performance.

While the Company will generally take disciplinary action in a progressive manner, it reserves the right, in its sole discretion, to decide whether and what disciplinary action will be taken in a given situation.

WHISTLEBLOWING AND GENERAL COMPLAINT RESOLUTION PROCEDURE

Whistleblower Policy

Note: The entire Complaint and Investigation Procedures for Accounting, internal Accounting Controls should be read by every employee and can be found on the HR Portal. You are responsible for knowing the procedures and acting in accordance with them.

The Company treats complaints about accounting, internal accounting controls, auditing matters or questionable financial practices seriously and expeditiously. Employees may confidentially and anonymously submit such complaints for review by the Company. The Company will protect the confidentiality and anonymity of the employee to the fullest extent possible, consistent with the need to conduct an adequate review. The Company abides by all laws that prohibit retaliation against employees who lawfully submit complaints under these procedures.

Other whistleblower complaints or disclosures can include, but are not limited to, intentional and unintentional violations of regulations and policies set forth in this handbook such as discrimination, sexual or other harassment, and retaliation. Any person may make a complaint or disclosure by following the process below.

General Complaint Resolution

In addition to whistleblower complaints, misunderstandings or conflicts can arise in any organization. To ensure effective working relations, it is important that such matters be resolved before serious problems develop. Most incidents resolve themselves naturally; however, should a situation persist that you believe is detrimental to your effective employment with Stride, you should follow the procedure described here for bringing your complaint to management's attention.

Step One. Discussion of the problem with your immediate supervisor is encouraged as a first step. If, however, you do not believe a discussion with your supervisor is appropriate, you may proceed directly to Step Two.

Step Two. If your problem is not resolved after discussion with your supervisor or if you feel discussion with your supervisor is inappropriate, you are encouraged to request a meeting with your HR Business Partner. In an effort to resolve the problem, the representative will consider the facts and may conduct an investigation.

Stride does not tolerate any form of retaliation against employees availing themselves of this procedure. The procedure should not be construed, however, as preventing, limiting, or delaying Stride from taking disciplinary action against any individual, up to and including termination, in circumstances (such as those involving problems of overall performance, conduct, attitude, or demeanor) where Stride deems disciplinary action appropriate.

ETHICAL AND SECURE WORKPLACE

We should have the comfort of knowing that we work in a safe, secure, and ethical workplace. Our hope is that we are proud to work here, feel good about our jobs, and attain our highest productivity. We have an online reporting system, managed by EthicsPoint, and an email address to enhance communication and empower you to promote safety, security, and ethical behavior.

Employees may email ombudsman@k12.com about unsafe activities, breaches of confidentiality, financial wrongdoing or other types of unethical or inappropriate behavior. Stride assigns these issues to be investigated or reviewed by a person who can ascertain the facts and make appropriate recommendations.

We have also partnered with EthicsPoint to manage online reporting for us. EthicsPoint allows you to communicate your concerns and enables you to remain anonymous if you so choose. Reports entered into the system are completely confidential, unless you choose to disclose your identity. The following instructions guide you through the

process available to submit a report through EthicsPoint. Use either of these convenient channels of communication.

Public Internet	Toll-Free Phone
From any computer with Internet access (home, public library, neighbor, etc.), go to www.ethicspoint.com and click on “File a new report”	Call your EthicsPoint toll-free hotline at 1-888-541-4701. An intake specialist will assist you with entering your report into the EthicsPoint system.

For complaints under the Whistleblower Policy, you may report through EthicsPoint, ombudsman@k12.com, OR submit a written complaint to the General Counsel. You do not need to provide your name or other personal information.

VIOLENCE IN THE WORKPLACE POLICY

It is the intent of Stride to provide a safe workplace for employees and to provide a comfortable and secure atmosphere for customers and others with whom we do business. Stride has zero tolerance for violent acts or threats of violence or property damage.

Stride expects all employees to conduct themselves in a non-threatening, non-abusive manner at all times. No direct, conditional, or veiled threat of harm to any employee or Stride property will be considered acceptable behavior. Acts of violence or intimidation of others will not be tolerated. Any employee who commits or threatens to commit a violent act against any person while on Stride premises will be subject to immediate discharge. If an employee, while engaged in Stride business off the premises, commits or threatens to commit a violent act or act of property damage, that employee will be subject to immediate discharge if the threat or act could adversely affect Stride and/or its reputation in the community.

Employees within Stride share the responsibility in identification and alleviation of threatening or violent behaviors. Any employee who is subjected to or threatened with violence or property damage, or who is aware of another individual who has been subjected to or threatened with violence, should immediately report this information to their supervisor, Human Resources, or a member of management. Employees must assume that any threat is serious. If you, as an individual, feel threatened and need protection, do not hesitate to report the situation to a supervisor. Any threat reported to a supervisor should be brought to the attention of management and/or the Human Resources Department. Human Resources will carefully investigate all reports, and employee confidentiality will be maintained to the extent possible.

WORKPLACE DATING/CONSENSUAL RELATIONSHIPS

Visually, verbally, and physically, Stride employees spend enormous amounts of time together. If your mind wanders from the task at hand to thoughts of a romantic relationship with another employee, let the following strategy guide your actions:

Should you decide to pursue another Stride employee romantically, and they say “no” or otherwise indicate they do wish such a relationship **do not** ask again, as a second attempt will be considered to be a violation of the Anti-Harassment Policy. Additionally, there is to be no dating, romantic or amorous relationships within reporting relationships, regardless of whether such activities are considered to be consensual by any or all of the parties. Pursuing a subordinate or supervisor is grounds for termination of employment. Should two employees be involved and become assigned to a single reporting line, both of the employees need to inform Human Resources so that the integrity of the reporting relationship can be maintained. In such situations, Human Resources may transfer and/or terminate either or both persons.

This policy applies equally for in-person and online contact.

WORKPLACE ACCIDENTS

No matter how insignificant an injury may seem at the time of occurrence, you shall notify the on-site supervisor and Human Resources immediately of any workplace accident or injury.

If you sustain an injury requiring immediate medical attention, call 911.

Please refer to [WORKERS' COMPENSATION INSURANCE](#) section of the Employee Handbook for further information.

EMPLOYEE SAFETY AND HEALTH

It is the policy of Stride to provide its employees a safe and healthy workplace and to follow procedures aimed at safeguarding all employees. Safety is everyone's responsibility. Every supervisor is expected to devote the time and effort necessary to ensure the safety of employees at all times.

Responsibilities of the employee include:

- Obeying the safety rules.
- Following safe job procedures and not taking shortcuts.
- Keeping work areas clean and free from slipping or tripping hazards.
- Immediately reporting all malfunctions to a supervisor.
- Using care when lifting and carrying objects.
- Observing restricted areas and all warning signs.
- Knowing emergency procedures.
- Reporting unsafe conditions to supervisors.
- Promptly reporting every accident and injury to a supervisor.
- Following the care prescribed by the attending physician when treated for an injury or illness.
- Attending all employee safety meetings.
- Participating in accident investigations.

INTERACTION WITH MINORS

Children are the central focus of our collective efforts, and their safety and security are paramount to all of us. The Company reserves the right to conduct background checks on any individual who has or could have access to students, other minors, or their personal data, including but not limited to those who move into positions that grant this access, even on a temporary basis, and periodic post-hire background of all individuals.

Personal relationships between Stride employees and students or other minors are not appropriate under any circumstances – whether consensual or not and regardless of the student's age and, therefore, are prohibited.

STUDENT RECORDS AND FERPA

As a technology-based education company, Stride has a vital interest in protecting the confidentiality of student information. Not only is this a requirement of a federal law known as FERPA (Family Educational Rights and Privacy Act), it is also a business imperative because parents and customers expect that we will make only proper use of student information.

As Stride continues to grow, we remind everyone of the importance of maintaining the confidentiality of student education records. Student education records include more than just a student's grades, social security number, individualized education plan and similar records. It includes almost all records directly related to a student and maintained by educational institutions and the contractors acting on their behalf, such as Stride. Student records must be treated with the utmost care and confidentiality, and any internal sharing must be limited to other Stride employees who need them to fulfill their job responsibilities or only when you know that it is lawful to do so.

Contact the Legal Department anytime you have a question about FERPA or any student privacy issue.

COMPANY PROPERTY

In an effort to ensure the safety and welfare of employees and invitees, Stride reserves the right, on reasonable suspicion that Company policy is being violated, to conduct searches or inspections, which includes, but is not limited to, employees' work areas, desks, and any other property located on Company premises or worksites. Entry on Company premises or worksites constitutes consent to searches or inspections.

DRUG-FREE WORKPLACE POLICY

The policy of Stride is to maintain a drug-free workplace. As a condition of continued employment, all Stride employees must comply with this policy. The term "workplace" is defined as Stride property, any Stride-sponsored activity, the room or rooms in which an employee performs work remotely for the Company, or any other site where the employee is performing work for Stride or representing Stride. The term "drug" as used in this policy includes alcoholic beverages and prescription drugs, as well as illegal inhalants and illegal drugs and/or controlled substances as defined in schedules I through V of the Controlled Substances Act, 21 U.S.C. Sec. 812, 21 C.F.R. Sec. 1308, and the state and local law of the jurisdiction where the workplace is located, including, but not limited to, marijuana, opiates (e.g., heroin, morphine), cocaine, phencyclidine (PCP), and amphetamines. If a Stride employee's primary worksite is a home office, alcohol may be permitted in the home, but drinking alcohol is strictly prohibited during working hours. An employee who engages in an activity prohibited by this policy shall be subject to disciplinary action, up to and including immediate termination of employment.

Prohibited activities under this policy include the possession, use, sale, attempted sale, distribution, manufacture, purchase, attempted purchase, transfer, or cultivation of drugs, as defined above, in the workplace, as defined above. Employees are also prohibited from being at the workplace with a detectable amount of drugs in their system. However, the use and/or possession of prescription drugs, when taken as directed and obtained with a valid prescription, shall not be a violation of this policy.

Information regarding the availability of treatment programs, if any, such as assistance provided by Stride's health care plan coverage of drug and alcohol abuse rehabilitation programs and the requirements for participation in drug and alcohol abuse education and training programs, may be requested by contacting Stride's health care plan or Stride's Employee Assistance Plan. Information about those plans can be found on Stride's Intranet-Human Resources tab and Benefit's section. Employees who have additional questions may submit a ticket to HR Services at servicedesk.k12.com.

WEAPONS

It is the intent of Stride to provide a safe and secure workplace for employees, clients, clients' customers, visitors and others with whom we do business. Stride expressly forbids the possession of weapons on Company property where such prohibition is permitted by law. Stride has *zero tolerance* for possession of any type of weapon, firearm, explosive, or ammunition. Company property includes, but is not limited to, all Company facilities, vehicles, and equipment, whether leased or owned by Stride or its clients. In addition, weapons in employee-owned vehicles parked on Company property are strictly forbidden. Weapons are any instrument of offensive or defensive combat and any device designed or traditionally used to inflict harm or injury and include, but are not limited to, explosives, firearms, bows, slingshots, switchblades, daggers, blackjacks, brass or metal knuckles, hunting knives, nunchaku ("nun-chucks"), dirk knives, bowie knives, star knives, sand clubs, razors, throwing stars and any device capable of projecting a ball, pellet, arrow, bullet, missile, shell or other material.

The possession of weapons on Company property will be cause for discipline, including immediate termination of employment. In enforcing this guideline, Stride reserves the right to request inspections of any employee and their personal effects, including personal vehicles, while on Company premises. Any employee who refuses to allow inspection will be subject to the same disciplinary action as being found in possession of firearms.

Employees within Stride share the responsibility for identifying violators of this guideline. An employee who witnesses or suspects another individual of violating this guideline should immediately report this information to his or her on-site supervisor.

DRESS CODE

Stride has a corporate-casual dress code, both for those employees who work at a facility and those who work at home. Nevertheless, employees of Stride, in the course of performing their jobs, come in contact with a variety of individuals and organizations outside of Stride. To a great degree, the appearance and level of professionalism demonstrated by its employees determine the reputation and image of Stride. Therefore, Stride employees should exercise judgment in their selection of attire for the office by dressing in a manner appropriate to the nature of their work and the reputation and image of Stride.

SMOKING

To maintain a safe and comfortable working environment and to ensure compliance with applicable laws, smoking is not allowed on Stride grounds or within the workspace, unless Stride has designated a specific area for smokers or as otherwise provided by law.

Non-permitted Items and Activities

- **All forms of tobacco**, including but not limited to:
 - cigarettes
 - cigars
 - pipes
 - hookahs
 - electronic cigarettes
 - vapes
 - all forms of smokeless tobacco
- **Tobacco use** includes smoking, chewing, dipping or any other use of tobacco products.
- **Smoking** refers to inhaling, exhaling, burning or carrying of any lighted or heated tobacco product, as well as non-tobacco smoking substances and smoking instruments.

The policy also applies to the use of any tobacco brand or corporate name, trademark, logo, symbol, motto, or messaging that is identifiable with any brand of tobacco product or company which manufactures tobacco. Because Stride may be subject to criminal and civil penalties for violations of applicable smoking laws, we must insist on strict adherence to this policy. Employees smoking in any non-smoking area may be subject to disciplinary action, up to and including termination. Please contact your on-site supervisor or the Human Resources Department if you have any questions regarding the smoking policy.

HOURS OF OPERATION

The normal workweek for Stride is Monday through Friday, and core business hours are typically from 8:30 a.m. to 5:00 p.m., with a thirty-minute lunch. Other workweeks and schedules may be adopted based on business need.

All employees are expected to work extended hours as required by business needs. Non-exempt employees will be paid according to laws regarding overtime provisions. Non-exempt employees must receive written approval from their supervisor prior to working overtime. However, even if you did not receive such approval, your time card **MUST** accurately record all time worked. The time record you submit is your representation to Stride of the time you worked. Stride will rely on that representation. If you believe that you are being pressured in any way to not record all time, you are to report that to your Human Resources Business Partner.

FLEX-TIME AND FLEX-PLACE

Flex-time is a term used to define an alternate work schedule by which an exempt employee may begin and end the workday within specified limits dictated by the needs of the job. It is also the policy of Stride to allow authorized employees the option of a flexible workplace. Flex-time and flexible workplace are subject to management and Human Resources approval.

Individual departments may use a flex-time work schedule or flex-place, subject to the following conditions:

- Each Department Head will ensure coverage during its “core hours” of operation. The Department Manager has the discretion to determine staffing coverage to meet the operating requirements of the department.
- Department Heads will be responsible for resolving intradepartmental schedule conflicts and assuring that proper coverage is maintained.
- A manager may, at their sole discretion, implement, continue, or discontinue flex-time/flex-place work schedules. At the sole discretion of the manager, an employee may be re-assigned to work core hours or work on-site at any time.
- PTO: The usage of these benefits is the same for employees working flex-time as for those working a standard schedule.

Employees shall not maintain any confidential or legally protected information (including, but not limited to, information protected by FERPA) at a flex-place site unless that information is protected from disclosure (e.g., by robust passwords or locks) to other persons (including family members) who share that site. Employees will use precautions to assure protection of confidential information.

A flex-time schedule, once agreed upon by the manager and Human Resources, should remain stable except when a special need arises. Emergency situations, which require schedule modification, may be accommodated with approval of the manager.

Responsibilities

Managers

Approve and revise work schedules based on business needs. Approval of alternative work schedules should ensure that:

- The level and quality of customer service is maintained or increased.
- Schedules coordinate with needs of internal and external customers.
- Resources are used efficiently and effectively.
- Operational deadlines are met.
- Absenteeism and tardiness are improved.

Employee

- Complete assigned work.
- Maintain full accessibility.
- Use work time effectively.
- Assure the same or improved level of customer service.
- Maintain dependable attendance.
- Document timekeeping accurately.
- Communicate work problems and needs to their manager.

Flex-place is a term used to define an alternate work venue within specified limits dictated by the needs of the job.

Eligible employees may have flex-place arrangements authorized for either their full or partial schedule (e.g., one or more days a week or a five-day schedule). Employees who are either full time or part time are considered virtual when their work is performed primarily from their home in a flex-place capacity. The employee's compensation benefits, work status, and work responsibilities will not change due to participation in the flex-place program. Flex-place employees are responsible for adhering to the same conditions of employment, performance standards, and policies and procedures as non-flex-place staff and are also responsible for all Stride equipment and its use. Flex-place employment does not change the nature of the employment at will relationship.

By participating in the flex-place arrangement, the employee agrees to maintain safe conditions in the at-home workspace, and to practice the same safety habits as he would in his office on the Stride premises.

Management and Human Resources approval is required prior to extending virtual employment to an employee.

Stride reserves the right to discontinue the flex-place agreement at any time.

General Guidelines and Eligibility

To be eligible to participate in the flex-time program, an employee must be in good standing within the department. ("Good standing" means, but is not limited to, no verbal or written warnings, performance improvement plans, and meets all performance objectives on time.) Employees shall have prior approval from their Manager and Human Resources to work a pre-approved flex-time schedule or to work at an alternative venue. Employees are responsible for attending all mandatory department meetings and training in person.

ABSENTEEISM AND TARDINESS

Employees are Stride's most valuable assets. As such, regular attendance is essential for efficiency and smooth operations. Unexcused absences, excessive excused absences, and/or habitual tardiness are discourteous to fellow employees and may result in corrective action up to and including immediate termination of employment.

Absences that are not pre-approved are considered unexcused. Under certain circumstances employee's absence for more than three (3) consecutive days for an illness may be requested to submit a doctor's note in support of their absence. In addition, three consecutive workdays of absence, without notifying Stride, is job abandonment and will be considered a resignation. While our guideline is three (3) consecutive days of absence before a note from a medical professional is required, a manager may request a note after one day or if a pattern of absence is noticed. The note can be given directly to Human Resources.

Employees should notify their supervisor as soon as possible on the first day of their absence (if not before). Notice to someone other than your supervisor is insufficient. Promptness in reporting an absence can help prevent inconvenience to Stride clients and fellow employees. Accordingly, in such situations, employees must notify their supervisors as soon as possible, but in no event later than one hour after their scheduled start time. An employee should make every effort to speak to a supervisor, manager, or senior-level manager to report the absence or tardiness. In the event this is not possible, a voicemail or e-mail may be sufficient. Note: Text messages are not a sufficient way to report an absence from work.

When the employee returns to work, the employee must submit their request for time off via UKG/Kronos to their supervisor. Employees should also follow local departmental protocols. For instance, those working for the enrollment center may also be required to notify Workforce Management.

EMERGENCY CORPORATE OFFICE CLOSING

It is the policy of Stride that offices be open during normal working hours in order to provide the service our customers require and expect from us. Stride has the sole discretion of determining if the office is to be closed in the event of inclement weather, power or other utility failure, fire, flood, or some other emergency.

During periods of inclement weather in the Washington, D.C., metro area, please call 703-483-7599 x9000 to determine the status of the Reston headquarters location. Any delay in opening or closure will be decided no later than 6:30 a.m. that day. In other locations, employees should put safety first in determining appropriateness of travel to their work location. The closure of an office does not include remote work sites associated with that office. Employees should make every effort to contact their manager for guidance.

Stride realizes its obligation to employees' physical well-being and strives to maintain a safe place for employees to work. The occasional emergency situation that may arise needs to be handled efficiently and calmly. Employees whose office is closed may be required to work remotely. Your supervisor will advise of procedures to be followed when offices are closed because of inclement weather or when emergencies arise during the day.

LEAVE POLICY FOR NATURAL DISASTERS AND EMERGENCIES

Leave may be available under this policy to an employee who has sustained severe or catastrophic damage to or loss of his or her primary residence, or has been ordered to evacuate that residence, as a result of a natural or man-made emergency or disaster.

During the time of a declared natural disaster, eligible employees are entitled up to eighty (80) hours of paid leave over the course of a continuous 60 day period if the employee is directly affected by the natural disaster

An employee who is **“directly affected”** by a natural disaster is when the employee or a member of the employee’s immediate family has been directly affected by the disaster in the form of personal injury or substantial loss of property, resulting in being dislocated from a residence or required to evacuate the community impacted by the disaster.

“Immediate family member” refers to the employee’s spouse, partner, parents, children, grandchildren and siblings.

“Natural disaster” refers to an event officially declared a natural disaster according to the President of the United States.

“Man-made emergency” is an event caused by the action of one or more persons that imperils life and property and produces dangers or the imminent threat of danger through exposure to biological, chemical, or radiological hazards. Examples include large spills resulting from transportation or industrial accidents, and effects of terrorist acts. Some man-made disasters may also be called technological disasters.

Eligible employees must request paid disaster leave within one year of the natural disaster declaration. The Human Resource department and the employee’s direct supervisor makes a determination of who qualifies for paid leave. Employees are responsible for ensuring that they have provided the required documentation to Human Resources and the direct supervisor, and this includes:

- Confirmation of the declaration of a State of Emergency or federal disaster status
- Documentation that the employee’s primary residence is in the official disaster area
- Verification as cited above of catastrophic damage to or loss of the residence, or requirement to evacuate the residence.

Human Resources will review all requests and make written determinations concerning the outcome of those requests to the employee within 1-2 business days. Emergency/Disaster Leave to provide emergency service shall be granted at the discretion of the requesting employee’s supervisor or designee and Human Resources. In evaluating such requests, supervisors should consider the needs of the employee, verification of eligibility, other applicable leave policies and the expected impact of the employee’s absence on the Company’s ability to fulfill its mission.

The written approval will include the anticipated return date for the employee, accrued sick and/or personal, or PTO applied to the leave time and how many paid hours of disaster leave will be applied.

TIME-OFF POLICY

At Stride, we work hard, care deeply for our students, and recognize that we occasionally need to take a respite from work. The Stride time off policy is designed to reward our efforts by providing time away from work. Employees are encouraged to plan time off well in advance, so scheduling conflicts can be avoided, and supervisors can balance staffing and business needs. A supervisor can deny the request for time off based on business needs, except for approved Family Medical Leave and other leave required by law.

Stride provides a variety of paid time off policies, some of which are in the back of this employee handbook. For instance, schools have specific policies impacting teachers. So, school-based employees should refer to their school policies for information about paid time off policies.

Exceeding Annual Allotted Time Off

Employees and their supervisors are responsible for tracking an employee’s use of paid time off to ensure the employee does not exceed annual allocations. Employees must make a written request to their supervisor. The employee is permitted to take the time off if their supervisor grants permission to take unpaid time off after exceeding the employee’s annual paid time off allocations. Employees are paid only for time worked.

Non-exempt (hourly) employees will receive pay for any hours worked in a day. Unpaid time will be deducted in 0.25 hour (15 minute) increments.

Exempt employees are paid for any day worked. Exempt employees who exceed their annual allotted paid time off are only permitted to take full days off as unpaid leave. Exempt employees cannot take a partial unpaid day off when the employee has exceeded the annual allotted time off. Stride makes no exceptions to the full-day paid time off in this

circumstance. Exempt employees are, however, permitted to take a partial day off when the employee has paid time off available subject to supervisor permission. Exempt employees must refer to the Stride Exempt Employees Reduction in Salary Policy for more information about the limited circumstances in which exempt employee's salary may be reduced.

Holidays

All of Stride, except Galvanize, Tech Elevator, and MedCerts, observe the following holidays each year:

- New Year's Day – January 1*
- Martin Luther King Day – Third Monday in January
- President's Day – Third Monday in February
- Memorial Day – Last Monday in May
- Independence Day – July 4*
- Labor Day – First Monday in September
- Thanksgiving Day – Fourth Thursday in November
- Day after Thanksgiving – Fourth Friday in November
- Christmas Day – December 25*
- Winter Break – Management's Discretion (decided no later than October each year)

When a holiday falls on a Saturday or Sunday, another day may be treated as the holiday.

Information about holidays for Galvanize, Tech Elevator, and MedCerts can be found in this handbook's addenda.

Employees will not receive holiday pay any days after an employee's last day the employee worked for the Company. For instance, an employee's last day worked is on July 3rd. That employee will not receive holiday pay for July 4th.

Full-Time Employees Regular full-time employees are eligible for paid holidays during each calendar year. Eligible full-time employees receive eight hours of holiday pay per holiday. To receive holiday pay, a non-exempt (hourly) employee must work their full regularly scheduled workday before and after the holiday unless an exception is approved in writing and in advance. Decisions about exceptions are made only for extenuating circumstances with consideration given to operational needs. Employees must make an exception request to their supervisor's supervisor. Employees at the Enrollment Center must make their request in writing and in advance to the Workforce Management Team.

Part-Time Employees

Active part-time employees are eligible for holiday pay on each Stride, Inc. holiday. Part-time employees will receive holiday pay for Company holidays falling on the employee's normal workday. The employee must work their regularly scheduled days before and after the holiday unless the employee's supervisor, or Knoxville Workforce management team has pre-approved these days off. Holiday pay is awarded by Payroll automatically based upon the employee's percent of Full-Time Employment ("FTE") status.

Interns or Seasonal Employees

Active interns and seasonal employees are eligible for holiday pay. Those who work full-time are eligible for eight (8) hours of holiday pay. Part-time interns or seasonal employees receive the same holiday pay as part-time Stride employees.

Employees on a Leave of Absence

Employees do not receive break or holiday pay when on any type of leave – paid or unpaid – including, but not limited to leaves of absences, Family Medical Leave Act (FMLA), or Natural Disaster Leave. Break or holiday pay includes school breaks, school holidays, and Stride corporate holidays. Employees on a Leave of Absence will only receive holiday pay when:

- i. The employee works the day before the holiday or break, or utilizes a pre-approved paid time off day (not unscheduled / call-off); AND
- ii. The employee works the day after the holiday or break, or utilizes a pre-approved paid time off day (not a call-off or unscheduled day.)

Overtime Calculations and Holidays

Holiday pay does not count as hours worked in calculating overtime for the week.

Holidays and Paid-Time Off

If a paid holiday falls within an employee's scheduled vacation or paid time off, that day is counted as a holiday and will not be counted as a vacation or a Paid Time Off day.

Floating Holidays

Stride employees may be eligible to receive floating holidays in addition to Stride's paid holidays. Determination regarding the number and allocation timing of floating holidays available for a calendar year will be made by executive leadership and communicated to eligible employees before the beginning of the calendar year. Floating holidays may be utilized at the employee's discretion, if approved in advance by his or her supervisor, to recognize religious, cultural, personal or other days during which Stride remains open.

Any floating holidays granted for a calendar year must be used by December 31st and will not carry over to the following year. Unused floating holidays will not be paid out at the time of termination. Stride will adhere to state and local regulatory variances around paying out paid time off.

Floating holiday hours must be used in full day increments (8 hours) unless the employee is part-time.

Part-time employees will receive a prorated allocation of floating holiday hours in accordance with the company's overall approach to part-time holiday hours. These hours must be used in the increments in which they are issued.

New hires who join Stride during the year may receive a prorated allocation of floating holidays depending upon their start date.

A floating holiday must be scheduled and approved in advance by the employee's immediate supervisor by submission into the timekeeping system utilized by his or her team.

Paid Time Off ("PTO") Plan

All Stride full-time employees earn paid time off in accordance with this plan EXCEPT those:

- whose work site is in California, Illinois, Louisiana, Massachusetts, Nebraska, or Rhode Island who are on accrual-based plans; or
- are eligible for another PTO plan set forth in this handbook such as school-based plans,

Stride's PTO can be used for vacation, sick leave, and personal leave. Part-time employees are not eligible for Enhanced PTO. Their leave benefits are described in the Part-Time Employees section below.

PTO benefits for the full calendar year¹ are:

¹ Paid Time Off (PTO) is awarded as follows:

1. One half of the employee's annual PTO amount is awarded on January 1 and can be used from January 1 through June 30. For example, a full-time employee below director level with two years of service would be awarded half of the 20 days of PTO on January 1. Those 10 days of PTO can be used from January 1 to June 30. Employees cannot carry over any awarded, but unused, PTO from June 30 to July 1.
 - a. Stride allows employees to "go negative" between January 1 and June 30. This means that employees are permitted to have a negative PTO balance between January 1 through June 30. The negative balance cannot be less than the number of PTO days awarded on January 1. In the example above, the negative balance cannot be a number less than -10 (i.e., -11).
2. The remaining one half of the employee's annual PTO amount is awarded on July 1 and can be used from July 1 through December 31. Employees cannot carry over any unused PTO from December 31 to January 1.
 - a. Any negative PTO balance that existed on June 30 will offset the amount awarded on July 1. In the example above, if the employee had a balance of -10 on June 30, that amount would completely offset the 10 days awarded on July 1, leaving the employee with no available PTO for the period from July 1 to December 31.
 - b. If an employee has a positive PTO balance on June 30, the employee can go into a negative balance. The negative balance cannot be less than the negative of the number of days of PTO that were remaining on June 30.

Full-Time Employees Below Director

Years of Service	PTO Days Annual Award
0-4.9 years	160 hours = 20 days
5-9.9 years	200 hours = 25 days
10+ years	240 hours = 30 days

Full-Time Employees Director and Above

Years of Service	PTO Days Annual Award
0-4.9 years	200 hours = 25 days
5+ years	240 hours = 30 days

The number of “Years of Service” is based on the number of years of service reached at any time during the calendar year. For example, a manager expected to reach ten years of service on November 1, 2019 will be awarded a total of 30 days of PTO for use during 2019, subject to the conditions set forth below.

During the first calendar year of employment, the “PTO Days Annual Award” will be prorated, based on the first day of the first month of employment and rounded to the nearest whole number. For example, a person whose first day of employment is February 18 and is below the level of Director, would have an annual award for that year of 19 days (20 multiplied by the product of 11 divided by 12).

Eligible Stride employees were migrated to from an accrual plan to a PTO plan on July 1, 2017. Employees with unused but earned vacation (up to but not exceeding 80 hours) at that time continue to have that time available for use for vacation time. PTO will always be deducted **first** from the employee’s PTO bank. Once an employee exhausts their annual PTO, the employee can use their remaining vacation time, if any exists. If an employee leaves the Company prior to exhausting their remaining vacation time, the remaining amount will be paid out at the time of separation.

Except for residents of Colorado or as otherwise expressly stated in this handbook, under no circumstance is PTO paid out upon separation of employment. Employees are also not permitted to carryover PTO from one year to the next.

Employees whose work location is in Washington state, however, are permitted to carryover 40 hours or less of PTO from one calendar year to the next. Employees will receive their PTO allocation for following calendar year; however, employees may never hold more than 40 hours of carryover sick time. Any hours that are carried over can only be used for sick time, not vacation or other personal reasons.

Transfers or job changes may impact an employee’s eligibility for a specific PTO plan. Employees eligible for a different PTO plan due to a transfer or job change will not carry over PTO from the previous plan to the new plan. Once the change is complete, the employee will receive a prorated amount of PTO in the new plan.

Vacation, Personal Time and Sick Leave

Effective January 1, 2022, Stride full-time employees whose work site is in Illinois, Louisiana, Massachusetts, Nebraska, or Rhode Island will transition from their existing vacation accrual, sick and personal time off benefits to a Paid-Time Off (PTO) Plan. Rather than receiving one lump sum annually in January, PTO time will accrue as follows:

Full-Time Employees Below Director

Years of Service	PTO Days Annual Award	Accrual Rate: Hours per Pay Period (bi-weekly pay)	Maximum Balance of Accrued Days (Hours)
0-4.9 years	160 hours = 20 days	6.15 hours	15 days (120 hours)
5-9.9 years	200 hours = 25 days	7.69 hours	20 days (160 hours)
10+ years	240 hours = 30 days	9.23 hours	25 days (200 hours)

Full-Time Employees Director and Above

Years of Service	PTO Days Annual Award	Accrual Rate: Hours per Pay Period (bi-weekly pay)	Maximum Balance of Accrued Days (Hours)
0-4.9 years	200 hours = 25 days	7.69 hours	20 days (160 hours)
5+ years	240 hours = 30 days	9.23 hours	25 days (200 hours)

The “Maximum Balance of Accrued Days (Hours)” is the maximum number of days/hours that can be held at any one time and encourages the use of PTO time. Once an employee reaches the accumulated hours in the “Maximum Balance of Accrued Days (Hours)”, the employee will NOT earn any additional PTO until they use their PTO to reduce the available balance below the maximum accrual cap. When the accrued PTO balance has dropped below the maximum for a pay period, PTO accrual will resume. There will be no retroactive accrual.

The “PTO Days Annual Award” is the maximum number of days/hours an employee is eligible to receive in a calendar year, assuming no accruals are missed due to reaching the “Maximum Balance.” The number of “Years of Service” is based on the number of years of service reached at any time during the calendar year. For example, an employee expected to reach ten years of service on November 1, 2022 is eligible to accrue up to a total of 30 days of PTO for use during 2022.

Only PTO hours accrued can be used. Employees are not permitted to take PTO in excess of their accrued hours unless otherwise required by law. PTO hours for employees in Illinois, Louisiana, Massachusetts, Nebraska and Rhode Island will not reset each year and will be paid out upon termination.

Any vacation time accrued in 2021 under the old policy will carryover to 2022. Employees will be able to see this time as Frozen Vacation Accrued in Workforce Management and is paid out upon termination.

Stride employees whose work site is in California are eligible for Vacation, Personal Leave and Sick Leave as set forth herein EXCEPT those who are eligible for school-based PTO plans.

Employees in this Vacation/Sick/Personal Leave Plan are not permitted to take paid leave prior to earning it and are not permitted to take paid leave in excess of their earned leave unless specifically noted below or as otherwise required by law.

For these selected states, employees are eligible for the following:

Vacation

Stride full-time employees under this plan earn vacation at the rates noted below; however, employees are subject to a maximum vacation accrual cap.

Full-Time Employees Below Director

Years of Service	Accrual Rate: Hours Per Pay Period (bi-weekly pay)	Maximum Balance of Accrued Days (hours) for employees whose primary work office is in California
0-47 months	3.076	17.50 (140)
48-71 months	4.615	26.25 (210)
72+ months	5.230	29.75 (238)

Full-Time Employees Director and Above

Years of Service	Accrual Rate: Hours Per Pay Period (bi-weekly pay)	Maximum Balance of Accrued Days (hours) for employees whose primary work office is in California
0-47 months	4.615	26.25 (210)
48+ months	6.153	35.00 (280)

Stride recognizes how important it is for employees to take a needed rest from work. Therefore, Stride, Inc. caps the number of vacation hours available per the table above to encourage the use of vacation time. Once an employee reaches the accumulated hours in the Vacation Accrual Caps chart, the employee will NOT earn any additional vacation time until the employee uses their vacation time to reduce the available vacation balance below the maximum vacation accrual cap. When the accrued vacation balance has dropped below the maximum for a pay period, vacation accrual will resume. There will be no retroactive accrual.

Employees in California will have their entire accrued but unused vacation time rolled over into the new fiscal year. Accrued and unused vacation time will be paid to full time employees upon separation from Stride.

Part-Time Employees

Part-time employees are those who average less than 30 hours per week.

Paid Time Off (PTO)

Eligible part-time employees will receive pro-rated vacation based on their first date of employment. Stride part-time employees living in all states EXCEPT California receive 3 vacation days on January 1st of each year. This time does not carry-over to the next year nor is paid out at the end of the calendar year. Any unused time will not be paid at separation from Stride.

Part-time employees living in California will receive 3 vacation days on January 1st of each year. California residents are eligible to carry-over vacation each year; however, these residents are permitted a maximum vacation balance of 42 vacation hours. Once the maximum vacation days have been accrued, no additional vacation time will be earned. Accrual will resume only when the accrued paid time off balance has dropped below the maximum for a pay period. There is no retroactive accrual. Accrued vacation is paid to these California residents upon separation from Stride.

Sick Time

Part-time employees living in all states EXCEPT California are eligible for up to two (2) paid sick days per year. Part-time employees living in California are eligible for 24 hours of paid sick leave per year. Sick time is a benefit that is refreshed annually (based on a calendar year) and is not carried over year to year except as explicitly noted below. Unused sick time is not paid out upon termination.

Leave under this policy may be used in connection with the diagnosis, care or treatment of an existing health condition for, or the preventive care of, an employee or an employee's immediate family member. An "immediate family member" for purposes of this policy includes spouses, registered domestic partners or civil union, children (if a dependent or under the age of 21), and parents (including step-parents and parents-in-law).

Employees must notify their immediate supervisor as soon as they know they will not be able to report to work due to illness unless their illness prevents them from doing so. (Text messages are not an appropriate way to inform Stride that you are taking a sick day.) If three (3) or more consecutive sick days (paid or unpaid) are taken, you might be required to provide a note from a medical professional. The note can be given directly to Human Resources. Additionally, you might be given (and may always request) information about contacting Stride's FMLA vendor for a leave of absence and/or the Employee Assistance Program (EAP) to ensure you understand the options available to help you get healthy.

Several states and cities have different requirements regarding paid sick leave. For employees who work in the following cities (for Oakland, California including employees who only work in that city two days per week) and states, the provisions regarding paid sick leave that vary from those above are:

California: Paid sick leave also applies to temporary employees and to employees who work in California at least 30 days in a year. If you work part-time, your normal work site is not in California, but you travel to California for business, it is your responsibility to notify HR when you reach the 30-day requirement. HR will then verify that the requirement has been met. Any day in which you conduct work in California (other than, for example, passing through a California airport to connect to a flight out of state) is considered a day worked in California. Employees who work in San Francisco or Oakland (and, for Oakland, as little as two days per week), will accrue paid sick leave at the rate of one hour of leave for every 30 hours worked (up to a maximum of 72 hours), rather than receiving a lump sum at the beginning of the year. Once the maximum accrual has been reached, no additional sick leave time will accrue until some of the accumulated sick leave time has been utilized, so that the balance has been reduced below the maximum. An “immediate family member” of a California employee also includes children of any age, grandparents and grandchildren. California employees may also take sick leave if they have been a victim of domestic violence, sexual assault or stalking. San Francisco and Oakland employees who separate from employment with Stride and who are re-employed by the Company in California within a year of separation will have their accrued, unused bank of sick leave (if any) reinstated. If an employee who works in San Francisco or Oakland has no spouse or domestic partner, an “immediate family member” will include any one individual designated by the employee within 10 business days of his or her first date of employment with Stride. That designation may also be made, or may be revised, during each year’s open enrollment season for benefits.

Massachusetts: Paid sick leave applies to temporary employees. Massachusetts employees may also take sick leave to address the legal effects of domestic violence. Massachusetts employees who separate from employment with Stride and who are re-employed by the Company in that state within a year of separation will have their accrued, unused bank of sick leave (if any) reinstated.

Maine: Military Veterans whose work location is in Maine are permitted to use available paid time off to attend scheduled appointments at the Department of Veterans Affairs medical facilities. If the Military Veteran employee has no paid time off remaining, the employee is permitted to take unpaid leave. Veterans are required to give their manager notice of the appointment as soon as reasonably possible.

Portland, Oregon: Part-time Portland employees are eligible for 40 hours of paid sick leave per year, which is awarded (front-loaded) on January 1st. Portland employees cannot carry over unused earned sick time to the next calendar year. An “immediate family member” of a Portland employee also includes grandparents and grandchildren. All Portland employees may also take sick leave if they, their minor children or their dependents have been a victim of domestic violence, sexual harassment, sexual assault or stalking in order to address the social or legal issues associated with those events.

Washington State: Part-time (non-exempt) employees in Washington earn sick time at the rate of one hour for every forty hours worked. The carryover balance cannot exceed forty hours for any employee (exempt or non-exempt.) Employees are not required to search for, or to find a replacement worker to cover hours in which an employee is on paid sick leave as a condition of taking paid sick leave. Employees using permissible paid sick time under this Washington policy will not be subject to discipline for the mere usage of sick time. When a separated employee is rehired within twelve months of their separation date, that employee may be eligible to have previously accrued unused paid sick leave reinstated. An employee is eligible when their start date is no more than twelve months from their separation date; returns to the same location or a different business location in WA; and the employment relationship remains the same. Employees who return to under a different employment relationship are not eligible for reinstatement of sick time, such as an employee of the board of a school returning as a Stride employee. Employees who work in Seattle will accrue paid sick and safe leave for these purposes at the rate of one hour of leave for every 30 hours worked, up to a maximum accrual of 72 hours. Stride is considered a Tier III employer in Seattle. Such employees may carry over up to 72 hours of the paid leave into a new year. However, no more than 72 hours of the paid leave can be used in a year. The paid leave will not be paid out upon separation from employment. However, if a Seattle employee separates from employment and returns to employment with Stride within seven months (while still working in Seattle), the accrued, and unused paid leave will be reinstated. Seattle employees may also use the leave in the event of the closure of his or her child’s school or place of care by a public official for the purposes of limiting the spread of infections or toxins or for the response to hazardous materials. If additional leave is needed for any of these purposes by a Seattle employee, the employee should contact Human Resources.

Washington, DC: Part-time employees who work in the District of Columbia will accrue paid sick leave at the rate of one hour of leave for every 37 hours worked (up to a maximum of seven days of leave in a year). All DC employees may carry over their accrued, unused sick leave to the next calendar year but are not permitted to use more than seven days hours of paid sick leave per year. An “immediate family member” of a DC employee also includes spouses

of children, spouses of siblings, and a person with whom the employee has a committed relationship and who has shared a common residence for at least the previous 12 months. DC employees may also take sick leave to address the social or legal effects of domestic violence, sexual assault or stalking that they or their immediate family members have suffered. DC employees who separate from employment with Stride and who are re-employed by the Company in that jurisdiction within a year of separation will have their accrued, unused bank of sick leave (if any) reinstated.

DOMESTIC ABUSE AND SEXUAL VIOLENCE LEAVE

All employees may use their paid sick leave or PTO to attend to care or treatment of a health condition they or their immediate family member (as defined in the section on sick leave) need stemming from an instance of domestic violence, sexual assault or other crimes.

Employees who work in the following locations may take additional leave as noted.

- California: California employees may use their sick leave and/or annual leave to attend to legal, social or relocation needs if they have been a victim of domestic violence, sexual assault or stalking. If additional leave is needed related to those crimes, please contact Human Resources. California Domestic Violence Leave: https://www.dir.ca.gov/dlse/Victims_of_Domestic_Violence_Leave_Notice.pdf
- Colorado: Persons who have been employed by Stride in Colorado for at least 12 months, may take three days of unpaid leave after exhausting all other leave (annual, Non-FMLA Medical Leave, sick) available to employees. The leave can be taken by a victim of domestic abuse, stalking, sexual assault or any other crime that includes domestic abuse. The leave can be taken to attend to the legal, relocation and health issues that stem from the incident.
- Connecticut: In addition to such paid leave as may be useable for such purposes under Stride policies, Connecticut employees may take such unpaid leave to total no more than 12 days leave if the employee or that person's family member is a victim of domestic violence, sexual assault or stalking. Such leave may be taken to attend to the legal, relocation and health issues that stem from the incident.
- Florida: Florida employees may take up to three days of unpaid leave. Employees may take this leave if they or their family or household member has been a victim of domestic or sexual violence and, as a result, the employee needs to attend to a medical, social or legal issue. If an employee works in Miami-Dade County and Stride has had at least fifty employees working in that county in the previous twenty weeks, the employee may take up to thirty days of unpaid leave for these purposes, after exhausting any paid leave that is available for these purposes. Miami-Dade employees should contact Human Resources to determine whether this additional unpaid leave is available to them.
- Hawaii: Employees who work in Hawaii may take up to thirty days of unpaid leave if the employee or the employee's child is the victim of domestic violence and, as a result, needs to take the leave to attend to medical, relocation, legal or victim service organization issues.
- Illinois: After exhausting all other paid leave (annual, Non-FMLA Medical Leave, sick) available to employees, Illinois employees may take up to twelve weeks of unpaid leave. Employees may take this leave if they have been a victim domestic or sexual violence and, as a result, need to attend to a medical, social or legal issue.
- Kansas: Kansas employees may take up to eight days of unpaid leave. Those employees may take this leave if they have been a victim domestic or sexual violence and, as a result need to attend to a medical, social or legal issue. Kansas employees are permitted to take available paid leave (annual, Non-FMLA Medical Leave, sick) for these purposes prior to taking this leave.
- Maine: If a Maine employee or that person's spouse, child or parent has been a victim of domestic violence, stalking, sexual assault, or other crimes of violence resulting in a need to attend to a medical, social or legal issue, the employee should contact Human Resources about taking unpaid leave.
- Massachusetts: Massachusetts employees may take sick leave to address the legal effects of domestic violence.
- New Jersey: New Jersey employees may take up to twenty days of unpaid leave. Employees may take this leave if they or their family or household member have been a victim of domestic or sexual violence and, as a result, need to attend to a medical, social or legal issue.
- New Mexico: New Mexico employees may take up to fourteen days of unpaid leave. They may take this leave if they have been a victim of domestic assault and, as a result, need to attend to a legal issue.
- New York (only New York City and Westchester County): If an employee who works in either New York City or Westchester County has been a victim of domestic violence, stalking, or a sexual offense resulting in a need to attend to a medical, social or legal issue, the employee should contact Human Resources about taking unpaid leave.

- North Carolina: If a North Carolina employee needs to obtain relief under the state's domestic violence law, the employee should contact Human Resources about talking unpaid leave.
- Oregon: If an Oregon employee or that person's minor or dependent child has been a victim of domestic violence, stalking, sexual assault, or harassment resulting in a need to attend to a medical, social or legal issue, the employee should contact Human Resources about talking unpaid leave. If the employee was the victim, that person may first take up to 160 hours of paid leave (this is in lieu of, not in addition to, the use of sick leave for such purposes). Portland employees may also take sick leave if they, their minor children or their dependents have been a victim of domestic violence, sexual harassment, sexual assault or stalking in order to address the social or legal issues associated with those events.
- Pennsylvania-Philadelphia (only): If an employee (or that person's spouse, domestic partner, parent, child, or intimate partner) who works in Philadelphia has been a victim of domestic violence, stalking, or sexual assault resulting in a need to attend to a medical, legal, relocation, or victim services organization issue, the employee can take up to eight weeks of unpaid leave.
- Pennsylvania (state-wide): An employee who finds it necessary to appear at court-related proceedings associated with being a victim of, or a witness to, a crime or member of such victim's family will be granted leave from work in accordance with state law. An employee taking victims-of-crime leave must utilize all accrued paid time off before continuing leave on an unpaid basis. To the extent allowed by law, Stride shall maintain the confidentiality of any employee requesting victims-of-crime leave.
- Rhode Island: An employee who works in Rhode Island and has been the victim of a crime may take unpaid leave to attend court proceedings stemming from the crime.
- Washington: If a Washington employee or that person's family member has been a victim of domestic violence, stalking, or sexual assault resulting in a need to attend to a medical, social or legal issue, the employee can contact Human Resources about talking leave with or without pay. Victims of domestic violence and their family members are permitted to use any available paid leave. Leave can be used as a single block of time, intermittently, or an adjusted schedule. Documentation may be required.
- Washington, D.C.: DC employees may use their sick leave for domestic violence purposes.

BEREAVEMENT LEAVE

If a death occurs in the immediate family of a full-time or part-time regular employee, the employee will be compensated for time lost from their regular work schedule in accordance with the following guidelines.

- A full-time employee may request a leave of absence with pay for a maximum of five (5) consecutive business days
- A part time employee may request a leave of absence with pay for a maximum of three (3) consecutive business days

An immediate family member for purposes of this policy is a spouse, domestic partner and partner in a civil union; a child, parent, sibling, a grandparent, father, mother, son, or daughter, including their comparable step or half relation, adoptive family members, or in-laws; or anyone living in an employee's household.

A full-time employee will be allowed two (2) days off and a part time employee will be allowed one (1) day off in the event of the death of a relative who is not a member of your immediate family as defined above.

These days are to be taken consecutively within a reasonable time of the day of the death or day of the funeral and may not be split or postponed.

An employee is allowed up to ten (10) days maximum per calendar year for this benefit. An employee may, with his or her supervisor's approval, use any available vacation or available personal time for additional time off as necessary. Proof of death and relationship to the deceased may be required.

Upon returning to work, the employee must record their absence as a Bereavement Leave on their attendance record in UKG.

Employees who work in Oregon may take up to two weeks of leave per death of a family member (as defined below), up to a maximum of 12 weeks in a 12-month period, to make arrangements necessitated by the death, to attend the funeral or memorial service, or to grieve. A family member, for this purpose is the employee's spouse, same-sex domestic partner, child, parent, parent-in-law, grandparent, or grandchild, or the same relations of an employee's

same-sex domestic partner or spouse. Leave taken pursuant to this paragraph is in lieu of the bereavement leave set forth above.

Employees who work in Illinois and who are also eligible for FMLA leave may take up to two weeks of leave per death of a child (whether biological, adopted, foster, step, legal ward or in loco parentis) within sixty days of when the parent receives notice of the death. In the event of the deaths of multiple children, two weeks of leave may be taken per child up to a maximum of six weeks in a twelve-month period. Although this is not FMLA leave, this leave is also limited by the extent to which you have available FMLA leave. For example, if you have taken all 12 weeks of available FMLA leave within the past 12 months, you will not be eligible for any bereavement leave under this paragraph. The leave may be taken to make arrangements necessitated by the death, to attend the funeral or memorial service, or to grieve. Leave taken pursuant to this paragraph is in lieu of the bereavement leave set forth above.

JURY DUTY AND WITNESS LEAVE

If a full-time regular employee is summoned to jury duty, the employee will receive his salary during the period of jury duty for up to a maximum of five working days per calendar year. If the jury service extends beyond five days, full-time regular employees are allowed to use their own vacation or personal time to cover the extended days otherwise they will go without pay, except as noted below. All employees are also permitted to retain the allowance they receive from the court for such service.

A part-time regular employee will be allowed to use their own vacation or personal time (if applicable) otherwise they will be given time off without pay while serving jury duty, except as noted below.

All employees are allowed unpaid time off if summoned to appear in court or at a deposition as a witness. Such time off will be paid to the extent payment is required under the "Domestic Abuse and Sexual Violence Leave" policy.

To qualify for jury or witness duty leave, an employee must submit to his supervisor a copy of the summons, subpoena or notice as soon as it is received. Employees must notify their supervisor as soon as it is known that jury duty will be extended.

Alabama, Delaware, Georgia, Louisiana, Nebraska and Tennessee: All employees who work in any of these states will be paid their regular salary for their entire period of jury duty.

Colorado: Part-time employees who work in Colorado will be paid their regular salary, up to a maximum of \$50, for each of the first three days of jury duty.

Massachusetts: Part time employees who work in Massachusetts will be paid their regular salary for each of the first three days of jury duty.

New York: Employees who work in New York will be paid their regular salary, up to a maximum of \$40, for each of the first three days of jury duty.

VOTING

As part of Stride's company-wide effort to encourage everyone to exercise their right to vote, Stride provides its employees with four hours (a half day) off to vote for Election Day in November. Employees are permitted to use this time in two ways: (i) to vote in person on election day; or (ii) to vote early by visiting their local registrar's office or voting location in their city or county. Use of this time must be coordinated with and approved by the employee's supervisor. This time must be used on, or before election day and cannot be carried over past that date.

Employees are also encouraged to participate in local or state elections such as primaries and special elections. In those elections, an employee may take up to two hours of paid time off to vote when an employee's polling place does not either open at least two hours before the employee's work day begins, or remain open at least two hours after the employee's work day is scheduled to end. The time off to vote in these elections may not exceed two hours except where required by law. Exceptions are noted in the variations from the above voting leave policy below. Evidence of voter registration and voting may be required. Notice of the intent to take the time off must be given no later than the work day immediately before the day of the election.

Variations from the above voting leave policy are:

- Alaska: The amount of paid leave will be whatever amount of time is necessary to vote.
- Arizona: If an Arizona employee's polling place does not either open at least three hours before the employee's work day begins or remain open at least three hours after the employee's work day is scheduled to end, the employee may take as paid leave such length of time at the beginning or end of the work day that, when added to the time difference between work day hours and opening or closing of the polls, will provide a total of three consecutive hours to vote.
- California: California employees may take whatever amount of time they need to vote, but only two hours of such leave will be paid.
- Colorado: If a Colorado employee's polling place does not either open at least three hours before the employee's work day begins or remain open at least three hours after the employee's work day is scheduled to end, the employee may take up to two hours of paid time off to vote.
- Iowa: If an Iowa employee's polling place does not either open at least three hours before the employee's work day begins or remain open at least three hours after the employee's work day is scheduled to end, the employee may take as paid leave such length of time at the beginning or end of the work day that, when added to the time difference between work day hours and opening or closing of the polls, will provide a total of three consecutive hours to vote.
- Kentucky: Kentucky employees will be given a reasonable amount of paid time, but no less than four hours, in order to vote or to request or execute an absentee ballot.
- Minnesota: Employees are paid for the time necessary to appear at the employee's polling place, cast a ballot, and return to work on the day of a regularly scheduled election to fill a vacancy in the United States Congress, an election for a constitutional office, or an election for the Minnesota Legislature.
- Missouri: If a Missouri employee's polling place does not either open at least three hours before the employee's work day begins or remain open at least three hours after the employee's work day is scheduled to end, the employee may take up to three hours of paid time off to vote.
- Nevada: If it is impractical for a Nevada employee to vote either before or after his or her work day, the employee may take up to one hour of paid leave if the polling station is less than two miles from the employee's work site, up to two hours of paid leave if the polling station is at least two but less than ten miles from the employee's work site and up to three hours of paid leave if the polling station is ten or more miles from the employee's work site.
- New Mexico: If a New Mexico employee's polling place does not either open at least two hours before the employee's work day begins or remain open at least three hours after the employee's work day is scheduled to end, the employee may take as paid leave such length of time at the beginning or end of the work day that, when added to the time difference between work day hours and opening or closing of the polls, will provide a total of two consecutive hours to vote.
- New York: If a New York employee's polling place does not either open at least four hours before the employee's work day begins or remain open at least four hours after the employee's work day is scheduled to end, the employee may take up to two hours of paid time off, as well as enough unpaid time off as is necessary, to vote.
- Oklahoma: If an Oklahoma employee's polling place does not either open at least three hours before the employee's work day begins or remain open at least three hours after the employee's work day is scheduled to end, the employee may take up to two hours of paid time off to vote.
- Tennessee: If a Tennessee employee's polling place does not either open at least three hours before the employee's work day begins or remain open at least three hours after the employee's work day is scheduled to end, the employee may take up to three hours of paid time off to vote.
- West Virginia: If a West Virginia employee's polling place does not either open at least three hours before the employee's work day begins or remain open at least three hours after the employee's work day is scheduled to end, the employee may take up to three hours of paid time off to vote.
- Wisconsin: Wisconsin employees may take an additional one hour of leave, provided that the additional hour is unpaid.
- Wyoming: If a Wyoming employee's polling place does not either open at least three hours before the employee's work day begins or remain open at least three hours after the employee's work day is scheduled to end, the employee may take as paid leave such length of time at the beginning or end of the work day that, when added to the time difference between work day hours and opening or closing of the polls, will provide a total of one hour to vote.

LACTATION/BREASTFEEDING POLICY

Objective

As part of our family-friendly policies and benefits, Stride (the “Company”) supports breastfeeding mothers by accommodating the mother who wishes to express breast milk during her workday when separated from her newborn child.

Accommodation for Lactating Mothers

For up to one year (two years in Colorado, three years in Maine and Vermont) after the child’s birth, any employee who is breastfeeding their child will be provided reasonable break times to express breast milk for her baby.. Nursing mothers wishing to use a lactation room at Stride’s corporate headquarters must request/reserve the room by [submitting a ticket to servicedesk.k12.com](http://servicedesk.k12.com). Additional rules for use of the room and are posted in the room. Employees who work offsite or in other locations will be accommodated with a private area as necessary.

Breaks of more than 20 minutes in length will be unpaid, and the employee should indicate this break period on her time record.

FAMILY AND MEDICAL LEAVE (FMLA)

Any time you miss work due to your own serious medical condition or the care of an immediate family member with a serious medical condition or for the birth and care of a newborn child of the employee or for placement with the employee of a son or daughter for adoption or foster care, please contact Stride’s Benefits by [submitting a ticket](http://servicedesk.k12.com) to “HR Services” at servicedesk.k12.com..

Our Benefits team will provide you with information about FMLA requests including the contact information for our FMLA vendor. In addition to contacting the Stride Benefits Team, contact your supervisor or Human Resources Business Partner to discuss steps for business planning purposes

An employee seeking leave benefits under this policy must satisfy all eligibility requirements as set forth below and required by applicable federal law. This policy does not create any rights (contractual or otherwise) not already provided under federal, state or local law. Employees should, to the extent they wish to request and apply for family and medical related leave under any applicable federal or state law contact their supervisor or Human Resources along with our outside FMLA vendor.

Employee Rights and Responsibilities Under the Family and Medical Leave Act are located at this website:

<http://www.dol.gov/whd/regs/compliance/posters/fmlaen.pdf>

Basic Leave Entitlement

FMLA requires covered employers to provide up to 12 weeks of unpaid, job-protected leave to eligible employees for the following reasons:

- For incapacity due to pregnancy, prenatal medical care or childbirth;
- To care for the employee’s child after birth, or placement for adoption or foster care;
- To care for the employee’s spouse, son or daughter, or parent, who has a serious health condition; or
- For a serious health condition that makes the employee unable to perform the employee’s job.

Eligibility Requirements

Employees are eligible if they have worked for a covered employer for at least one year, for 1,250 hours over the previous 12 months, and if at least 50 employees are employed by the employer within 75 miles.

Definition of Serious Health Condition

A serious health condition is an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility, or continuing treatment by a health care provider for a condition that either prevents the employee from performing the functions of the employee’s job, or prevents the qualified family member from participating in school or other daily activities.

Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than 3 consecutive calendar days combined with at least two visits to a health care provider or one visit and a regime of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition. Other conditions

may meet the definition of continuing treatment.

Benefits and Protections

During FMLA leave, the employer must maintain the employee's health coverage under any "group health plan" on the same terms as if the employee had continued to work. Upon return from FMLA leave, most employees must be restored to their original or equivalent positions with equivalent pay, benefits, and other employment terms.

Use of FMLA leave cannot result in the loss of any employment benefit that accrued prior to the start of an employee's leave.

Use of Leave

An employee does not need to use this leave entitlement in one block. Leave can be taken intermittently or on a reduced leave schedule when medically necessary. Employees must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt the employer's operations. Leave due to qualifying exigencies may also be taken on an intermittent basis.

Substitution of Paid Leave for Unpaid Leave

Employees may choose or employers may require use of accrued paid leave while taking FMLA leave. In order to use paid leave for FMLA leave, employees must comply with the employer's normal paid leave policies.

Military Family Leave Entitlements

Eligible employees with a spouse, son, daughter, or parent on active duty or call to active duty status in the National Guard or Reserves in support of a contingency operation may use their 12-week leave entitlement to address certain qualifying exigencies. Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings.

FMLA also includes a special leave entitlement that permits eligible employees to take up to 26 weeks of leave to care for a covered service member during a single 12-month period. A covered service member is a current member of the Armed Forces, including a member of the National Guard or Reserves, who has a serious injury or illness incurred in the line of duty on active duty that may render the service member medically unfit to perform their duties for which the service member is undergoing medical treatment, recuperation, or therapy; or is in outpatient status; or is on the temporary disability retired list.

Employee Responsibilities

Employees must provide 30 days advance notice of the need to take FMLA leave when the need is foreseeable. When 30 days' notice is not possible, the employee must provide notice as soon as practicable and generally must comply with an employer's normal call-in procedures.

Employees must provide sufficient information for the employer to determine if the leave may qualify for FMLA protection and the anticipated timing and duration of the leave. Sufficient information may include that the employee is unable to perform job functions, the family member is unable to perform daily activities, the need for hospitalization or continuing treatment by a health care provider, or circumstances supporting the need for military family leave. Employees also must inform the employer if the requested leave is for a reason for which FMLA leave was previously taken or certified. Employees also may be required to provide a certification and periodic recertification supporting the need for leave.

Employer Responsibilities

Covered employers must inform employees requesting leave whether they are eligible under FMLA. If they are, the notice must specify any additional information required as well as the employees' rights and responsibilities. If they are not eligible, the employer must provide a reason for the ineligibility.

Covered employers must inform employees if leave will be designated as FMLA-protected and the amount of leave counted against the employee's leave entitlement. If the employer determines that the leave is not FMLA-protected, the employer must notify the employee.

Unlawful Acts by Employers

FMLA makes it unlawful for any employer to:

- Interfere with, restrain, or deny the exercise of any right provided under FMLA; or

- Discharge or discriminate against any person for opposing any practice made unlawful by FMLA or for involvement in any proceeding under or relating to FMLA.

Enforcement

An employee may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against an employer.

FMLA does not affect any Federal or State law prohibiting discrimination or supersede any State or local law or collective bargaining agreement which provides greater family or medical leave rights.

FMLA section 109 (29 U.S.C. § 2619) requires FMLA covered employers to post the text of this notice. Regulations 29 C.F.R. § 825.300(a) may require additional disclosures.

For [additional](#) information: 1-866-4US-WAGE (1-866-487-9243) TTY: 1-877-889-5627 or www.wagehour.dol.gov

NON-FMLA MILITARY LEAVE POLICY

Military leave will be granted to employees who are members of the U. S. Armed Forces and/or reserve components, including the National Guard, to attend required annual training or other duty required by the services. Advance notice is required to maintain such a leave status, unless advance notice is prevented by military necessity (such as a classified recall) or in those rare circumstances where it is impossible to provide advance notice. Employees must contact the Stride Benefits Team by submitting a ticket to “HR Services” at servicedesk.k12.com.

Stride Benefits will provide you with information about Non-FMLA Military Leave including contact information for any outside vendor who provides these services at the time of your request.

In addition to contacting Stride Benefits, contact your supervisor and Human Resources to discuss steps for business planning purposes. Employees will be required to provide a copy of the military orders.

Employees who take a military leave of absence will be granted two weeks of paid leave per year. If further leave is required, the employee will be paid the difference between their military pay and company pay for up to 6 months, granted the military pay is the lesser of the two, to a maximum of \$10,000 per year. Information regarding the employee’s military salary must be provided to Human Resources.

If any additional time is needed for military service after the 6 months of differential pay is exhausted, he or she may use vacation or personal time for military service. The use of an employee’s leave balances would be a supplement to the military pay an employee is receiving during service. If the military pay exceeds an employee’s Stride salary, the leave will be unpaid. Should an employee be required to take an extended leave without pay to fulfill his or her military duty, eligibility for reinstatement after military duty or training is completed is determined in accordance with all applicable federal and state laws.

Medical coverage will terminate on the last day of the month for which services to the Company were performed. This will be considered a “qualifying event” under COBRA. The employee and their eligible dependents will be able to continue benefits under COBRA in accordance with USERRA regulations or choose to accept coverage under the military plans in effect at the time.

Subject to the terms, conditions, and limitations of the applicable plans for which the employee is otherwise eligible, health insurance benefits will be provided by the Company if currently elected for the full term of the military leave of absence. Vacation, sick leave, and Non-FMLA Medical Leave will continue to accrue during a military leave to the same extent they accrue for employees who are not on military leave.

Stride complies with the Uniformed Services Employment and Re-employment Rights Act (USERRA). An overview of the Act can be found at: http://www.dol.gov/vets/programs/userra/USERRA_Private.pdf

Requests for a military leave of absence should be submitted at least 30 days prior to the start of the leave period. When the need for leave or an extension is not foreseeable, employees should give as much notice as is practicable.

STRIDE NON-FMLA MEDICAL LEAVE

An employee may be entitled to Stride's Non-FMLA Medical Leave within the first year of employment only. Stride may grant non-FMLA medical leave for up to eight (8) weeks if such leave is necessary for an employee's own medical condition or for the recovery from the birth of a child or for the care of a child born or placed for adoption with the employee. Approval of the leave is made by a third-party vendor based on documentation provided by the employee's medical professional.

A Non-FMLA Medical Leave of Absence will only be granted if the medical situation directly affects the employee. The Non-FMLA Medical Leave of Absence will not be granted for care or illness of a family member except as outlined in the first paragraph. A Non-FMLA Medical Leave of absence is unpaid and can only be taken on a continuous basis. No intermittent Non-FMLA Medical Leaves will be granted.

If an employee becomes eligible for FMLA during a Non-FMLA Medical Leave of absence, the FMLA leave will supersede and the employee's twelve weeks will be honored to the full extent under FMLA.

Employee Notification Requirements

The employee must notify Human Resources of the request to take a Non-FMLA Medical Leave at least thirty (30) days in advance of the expected leave by opening a claim with the Company's absence management vendor, MetLife. If the need for leave is not foreseeable, the employee must provide notification of leave to Stride's absence management vendor, their supervisor, and Human Resources as soon as is practicable under the circumstances and in compliance with Stride's established absenteeism and tardiness policies, or other like policies, with violation of the same resulting in possible disciplinary action, up to and including termination.

PAYDAY AND DIRECT DEPOSIT

All exempt employees will be paid biweekly. Exempt employees are paid on a salaried basis and are not eligible to receive overtime pay. It may be necessary for exempt employees to work past business hours and on weekends in order to complete their work without additional compensation or time off.

Non-exempt employees are paid on a bi-weekly and hourly basis for all hours worked in a pay period, including any overtime hours submitted for the period. If an employee's timesheet is not received in time for the payroll closing, a 40-hour week (or other regular schedule, if applicable) is assumed, and any overtime or time off taken will be reflected in the following pay period's paycheck. Full-time non-exempt employees should expect to work at least 40 hours per week, unless otherwise scheduled and approved by Stride. On occasion, workload and other factors may require that employees work more than 40 hours a week. Non-exempt employees must receive approval from their supervisor prior to working overtime. However, even if you did not receive such approval, your timecard **MUST** accurately record all time worked. The time record you submit is your representation to Stride of the time you worked. Stride will rely on that representation. If you believe that you are being pressured in any way to not record all time, you are to report that to your Human Resources Business Partner.

If an employee is terminated, they will be issued a check on the next regular payday, or in accordance with applicable state law, whichever is earlier. Expense payments owed to the employee will be paid according to the usual reimbursement schedule. Owed commission payments will be made according to the terms of the commission plan.

It is a requirement of employment that all employees must be on direct deposit, except where prohibited by law. Employees must make arrangements to receive payroll payments via Automated Clearing House (ACH) direct deposited. Exceptions can be made for short-term employees. Employees must also immediately report any pay errors immediately to their supervisor, and / or Payroll at timesheets@k12.com.

BONUSES

Non-exempt (hourly) employees are not eligible for Stride's annual bonus.

Exempt employees must have earnings in the pay period in which bonuses are paid to receive a bonus payment except when approved for Family Medical Leave Act (FMLA) time. Earnings do not include expense reimbursements, or other non-payroll payments. Employees who are terminated – whether voluntarily or involuntarily – cannot use paid time off as earnings during the bonus period. Further, an employee must be employed with Stride at the time of bonus payment.

Any employee who joins the Company during the last quarter of a fiscal year is ineligible for a bonus payment in that fiscal year's compensation planning cycle.

TIMESHEETS AND TIME-OFF REPORTING

All non-exempt and hourly employees must record their time worked on a daily basis, following their department standard timesheet and submittal process

Both exempt and non-exempt employees must submit a Request for Time Off form for any approved paid time off, and other leaves with or without pay. The Payroll department is responsible for ensuring that all employees comply with the Stride timekeeping policy. Managers have the discretion to approve or decline requests based on their specific business needs.

All timesheets and time-off requests must be made through UKG/Kronos, and must be approved by the employee's supervisor. Some departments or offices have tools for tracking time off. Please consult with your manager, or supervisor about utilizing these other tracking tools.

OVERTIME FOR NON-EXEMPT EMPLOYEES

It should be recognized that overtime and additional work other than that which is regularly scheduled might be required.

Overtime will be paid to eligible, non-exempt employees in accordance with applicable state law. The pay for regular overtime will be at the federal or state prescribed wage rate, whichever is higher. All overtime must be authorized prior to its occurrence by your immediate supervisor. All overtime will be clearly noted on your timesheet and should be initialed by your immediate supervisor.

If an employee's timesheet is not received in time for the payroll closing, a 40-hour week (or other regular schedule, if applicable) is assumed and any overtime or time off taken will be reflected in the following pay period's paycheck. Full-time non-exempt employees should expect to work at least 40 hours per week, unless otherwise scheduled and approved by Stride. Non-exempt employees must submit completed timesheets to Payroll each Monday for the preceding week. Employees must receive approval from their supervisor prior to working overtime. However, even if you did not receive such approval, your timecard **MUST** accurately record all time worked. The time record you submit is your representation to Stride of the time you worked. Stride will rely on that representation. If you believe that you are being pressured in any way to not record all time, you are to report that to your Human Resources Business Partner.

EXEMPT EMPLOYEES REDUCTION OF SALARY

Exempt employees are paid on a salary basis and, in general, must be paid their full salary for any week in which they perform work. Their salary may be reduced only in the following circumstances:

- Employees who are absent from work must have paid time off available to cover their absence unless: (i) their manager has pre-approved their absence as an unpaid day off in accordance with Stride's Exceeding Annual Allotted Time Off provisions; or (ii) the employee is utilizing other approved unpaid days off such as for FMLA, leave as a reasonable accommodation or Non-FMLA Medical Leave. Employees who earn sick, personal, and vacation time cannot use a vacation day unless it has been pre-approved by a manager.
- Employees who are absent from work for jury duty or attendance as a witness may have their salary reduced by the amount of payment they receive in the form of jury fees or witness fees. Their salary will not be reduced

by the number of hours or days they are absent unless they perform no work during a given week.

- Employees may be suspended without pay for other types of workplace misconduct, but only in full-day increments. This refers to suspensions imposed pursuant to a written policy applicable to all employees regarding serious misconduct including, but not limited to, workplace harassment, violence, drug and alcohol violations, legal violations, etc. The possibility of such unpaid suspensions is hereby incorporated into all such policies.
- Employees who work less than 40 hours during their first and/or last week of employment will be paid a proportionate part of their full salary for the time actually worked.
- Employees who take leave under the Family and Medical Leave Act will not be paid for that time unless they have available paid time off under the Stride paid time off policy. Their salary will be reduced by the hours missed, even if it is for less than a full day.

This policy is subject to applicable law. Stride will follow the state law regarding reduction of exempt employees' salaries if the state law is more favorable to employees.

Exempt employees will be reimbursed in full to the extent required by law for any isolated, inadvertent, or improper deductions as defined by law. Concerns about any salary pay deductions from exempt employees should be promptly directed to Human Resources for a resolution.

GARNISHMENTS AND LEVIES

Stride expects employees to avoid garnishments and levies. As permitted by law, employees may be subject to disciplinary action up to and including immediate termination of employment for repeated, multiple garnishments and levies, other than for child support, where court ordered garnishment is requested by law.

In all events, Stride will comply with applicable law as to garnishments and levies.

INTERNAL TRANSFER (EMPLOYEES CHANGING ROLES WITHIN STRIDE)

Every Stride employee should be thinking about his or her career goals and objectives. In order to apply for a job internally, the following conditions apply:

- Must be in "good standing" for at least the past 180 consecutive days. Good standing means completing assignments on time, enhancing the business, keeping commitments and deadlines, living the values, and having a positive effect on the workplace.
- Employees who have less than 180 days of tenure in their role must be in good standing, and must receive approval from their manager to apply for a new role,
- Must not currently be on a Written Warning or Performance Improvement Plan (PIP).
- Managers should be aware of the employee's interest in transferring.
 - NOTE: Employee must notify their manager if selected to interview with the hiring manager.

The process for applying for any open position within Stride is as follows:

- Go to www.K12.com/hrportal. Then go to "My Company" and then "Job Openings" and apply to the position you are interested in.
- The Recruiting Department will be in touch to review their application if they meet the requirements for the position.
- Interviews will be conducted with the hiring manager and team. (There may be additional internal and external candidates for the position.)

The best candidate will be selected. If it is an internal candidate, a change in title, cost center, manager, direct reports (where applicable), etc. will take place once an agreed-upon start date has been decided. Best practice is for the internal transfer to be completed within-2-3 weeks. If additional time is needed, the two managers should discuss a plan that is mutually beneficial. Human Resources must approve any exceptions to this policy.

OUTSIDE EMPLOYMENT AND VOLUNTEER POLICY

For purposes of this policy, an "outside job" includes employment (including self-employment and any volunteering),

work as an independent contractor and appointment to any board of directors, trustees or similar boards. This includes, without limitation, serving as a seller or distributor of goods or services (such as clothing, essential oils, real estate and fitness training).

All employees will be judged by the same performance standards and will be subject to the same scheduling demands, regardless of any outside work requirements. Employees must notify the Human Resources Department of any outside jobs and any outside job status changes. Permitting outside employment is at the sole discretion of Stride.

If Stride, in its sole discretion, determines that an employee's outside job is inappropriate, conflicts or interferes with performance, safety, availability or the ability to meet the requirements of Stride as they are modified from time to time, the employee may be asked to terminate the outside employment if he or she desires to remain with Stride. Outside employment that constitutes a conflict of interest is always prohibited.

Full-time employees may not hold outside jobs without prior, written approval from their supervisor and the Executive Vice President responsible for their department. Any requests for approval must be made in writing, on Stride's approved form, to Human Resources. Executive-level employees including those who hold a Senior Vice President role or higher must receive approval from the company's Board of Directors.

Part-time employees may hold outside jobs except as set forth in the Exceptions Require General Counsel Approval section in this policy (below.)

Exceptions Require General Counsel Approval

Employees, whether full-time or part-time, may not be employed by, serve as a director of, or provide services to any entity that is a customer of Stride (including, without limitation, school boards and districts that are customers), a supplier to Stride (whether a supplier of goods or services, including vendors providing personnel services such as Randstad) or that is a competitor of Stride. Any requests for an exception must be made on Stride's approved form and must be approved in advance by both the employee's supervisor and the Executive Vice President prior to sending the form to the employee's Human Resource Business Partner (HRBP.) Your HRBP will collaborate with the Senior Vice President of Human Resource and the General Counsel, or their designees to make a decision on the exception request.

Stride Serves: Paid Time Off to Volunteer

Stride Serves provides eligible Stride, Inc. full-time and part-time employees with up to 16 hours of Paid Time Off ("PTO") each year to use for approved volunteer opportunities. These opportunities will contribute to local communities in one of the following key areas: Children and Youth Services, Education, Health and Wellness, and Community Development and Outreach. The Company reserves the right to determine whether to approve a specific volunteer opportunity.

In addition to the 16 hours of PTO, a department lead may select one day out of the year in recognition of the Day of Service (observed traditionally during Martin Luther King, Junior Day) when your department will participate in a volunteer activity together for a specified number of hours as determined by your department lead.

Information on requesting and using Stride Serves volunteer time is available on the company's intranet [Stride Serves](#) page.

EMPLOYMENT OF RELATIVES

Stride permits the employment of qualified relatives of employees so long as such employment does not, in the opinion of Stride, create actual or perceived conflicts of interest. For purposes of this policy, "relative" is any of the following relationships by blood, adoption, marriage (including common law marriage), civil union, or domestic partnership (whether by law, or receiving employment benefits) - spouse, child, parent, sibling, grandparent, grandchild, aunt, uncle, first cousin, or corresponding in-law or "step" relation. Stride will exercise sound business judgment in the placement of related employees in accordance with the following guidelines:

- Individuals who are related by blood or marriage (including common law marriage, civil union or domestic partnership) are permitted to work in the same Stride facility, provided no direct reporting or supervisory/management relationship exists. That is, no employee is permitted to work within the "chain of

- command" of a relative.
- No relatives are permitted to work in the same department or in any other positions in which Stride believes an inherent conflict of interest may exist.

This policy applies to all categories of employment at Stride, including full-time regular, part-time regular and temporary classifications.

EMPLOYMENT OF MINORS

For the purposes of this policy, Minors are individuals under the age of 18 employed by Stride, Inc. or one of its subsidiaries. Stride does not employ minors under the age of 14 or, if greater, the minimum age permitted by state law. This policy is limited to the Company's interactions with Minors as its employees and does not address interactions with students in the classroom. This policy establishes guidelines for those in the Company who may work or interact with Minors who are employed by the Company.

When working with Minors, supervising Minors in their employment with the Company, and when participating in Company-run activities, Stride, Inc. employees must:

- Be vigilant in protecting the safety of Minors with whom they interact.
- Watch for signs of abuse or neglect of Minors, and promptly report suspected instances of abuse or neglect, or violations according to this policy's Procedures for Reporting Abuse or Neglect.
- Before employing a Minor, their supervisor must complete any required training including, but not limited to, state-mandated mandatory reporter training.
- While employing a Minor, their supervisor must monitor the Minor's working conditions at a Stride worksite and hours to ensure that it complies with this policy.

Responsibilities

Employees are responsible for becoming familiar with and following this policy. Supervisors are responsible for taking appropriate steps to help ensure compliance with it.

- Minors:** In states where such documentation is required, Minors must obtain and complete the documents required by law such as the Certificate of Age and/or Work Permit and/or Proof of Age and present it to Human Resources before employment can begin. Minors must monitor their Certificate of Age and/or Work Permit expiration date. Minors must also comply with all mandated restrictions on working hours and duties.
- Supervisors of Minors:** Supervisors of Minors must comply with all mandated restrictions on working hours and duties as well as with any limitations on the terms of employment required by policy. Supervisors are required to monitor Minor's working conditions at a Stride worksite, hours, and duties to ensure that the Minor's work adheres all requirements outlined in this policy.
- Human Resource Business Partners:** Provide guidance to the hiring manager when hiring a Minor for employment on documents required for employing a Minor, and to respond to questions about mandatory reporter training for corporate employees under this policy.
- Hiring Departments / Business Units:** Business Units must contact Recruiters prior to employing a Minor. All State mandated forms, approvals, certifications, and any Stride, Inc. documentation must be submitted and approved before the Minor can commence work.
- Recruiters:** Provide guidance to Hiring Managers on the recruiting, selection, and onboarding of Minors in employment. Track completion of background screening for Minors.

Work Permits, and/or Certificates of Age, and/or Proof of Age

All Minors must present a valid Certificate of Age and/or Work Permit and/or Proof of Age as required by their state of residence. Some states may require more than one of these documents. Human Resources must receive a copy of the Minor's Certificate of Age and/or Work Permit and/or Proof of Age and must approve it prior to the Minor's start date. Information about valid Certificates of Age, Work Permits, or Proof of Age may be found at the US Department of Labor's [website](#), or with state Wage and Hour divisions or their equivalent.

Supervisors, Human Resources, and Minors must monitor the expiration of Certificates of Age and/or Work Permits and/or Proof of Age. Minors are not permitted to work if their Certificate of Age and/or Work Permit and/or Proof of Age has expired.

Other Employment Documents

Minors must complete the same employment documents as other employees at hire including the Form I-9 to verify their identity and employment authorization. Additionally, Minors and their parent/guardian are required to sign the Company's Offer Letter, Agreement to Arbitrate, Confidentiality and Non-Solicitation Agreement, the Media Release form, and other applicable hiring documents prior to engaging in work for the Company.

Hours of Work

Supervisors of Minors are asked to be mindful of a Minor's educational demands. At minimum, Minors cannot perform work for Stride, Inc. during school hours. The US Department of Labor, and several states set requirements around Minor's work hours. The Company prohibits Minors from being employed:

- During school hours, or when school is "in session." Virtual school is considered "in session" during any week in which the public school district in which the Minor resides requires its students to attend the school, either physically or through distance learning, in the regular school year. Generally, summer school sessions are considered outside of local school hours.
- Before 7:00 am or after 7:00 pm in the Minor's local time zone except from June 1 through Labor Day where the Minor may work until 9:00 pm.
- More than three hours per day on a school day including Fridays, or more than eight hours on a non-school day.
- More than 18 hours per week during a school week, or more than 40 hours per week during a non-school week.
- More than six consecutive days during the Company's workweek.

Minor's Duties

The Company prohibits Minors from accessing students, or student data. The Fair Labor Standards Act (FLSA) places additional guidelines around the types of work Minors may perform in the workplace. Minors are permitted to perform:

- Work of an intellectual or artistically creative nature such as creating marketing materials, computer programming, writing software, data analysis, testing applications, equipment inventory, or reading and briefing industry reports.
- Office or clerical work including operating office machines.
- Errand work by foot, bicycle, and public transportation.
- Customer satisfaction surveys, or telephone sales when the customer is an adult.
- Providing input on teen-oriented products, and services.

The Fair Labor Standards Act (FLS) prohibits Minors from engaging in several types of work. Supervisors must review the Department of Labor's Hazardous Jobs [guidance](#) and state-specific [information](#). The following list highlights some, but not all, of several prohibited duties by the FLSA.

- Work performed in connection with the maintenance or repair of machines, or equipment. This prohibits, for instance, Minors from taking apart computers and performing manual repairs.
- Minors are permitted to drive themselves to and from work, though Minors cannot operate a motor vehicle while performing work for the Company. Minors also cannot ride outside the passenger compartment of a motor vehicle, such as in the back of a truck, during the course of work.
- Youth peddling, which entails "door-to-door" sales, or selling goods or services to customers at locations other than the Minor's employer's establishment. This prohibits Minors from traveling to the customer's worksite.
- Using power-driven tools.
- Construction.
- Working with hazardous materials.
- Working in laboratory settings.
- Lifting, carrying, pushing, or moving items weighing over ten pounds, or using power tools.

Minors and Events Involving Alcohol

Minors are prohibited from attending events, meals, or outings in which alcohol is present. Additionally, employees are prohibited from inviting Minors to such events.

Benefits

Minors who perform work for pay are eligible for paid time off, paid holidays, and other benefits as defined in the Employee Handbook based on employment classification. Minors are also eligible for Workers' Compensation where required by law.

Minors working as Seasonal Employees (these employees do not meet the Affordable Care Act's definition of Temporary Employees) are not eligible for medical plan benefits. Eligibility determinations are made by the Benefits team in accordance with the Affordable Care Act and applicable plan documents. Any Minor in a position that is eligible for medical benefits is eligible only for the standard health plan.

Criminal and Sex Offender Background Screening

Minors are required to undergo the Company's background screening effective June 1, 2021. Before supervising students enrolled in any of the Company's Florida-based Stride-powered programs, the supervisor must contact the school's Executive Director or Compliance leader to complete a state-mandated background screening.

Mandatory Reporter Training

Employees who supervise Minors may be considered mandatory reporters under state law, and therefore are required to complete any state-mandated training prior to supervising a Minor.

First-tier supervisors who have direct contact with a Minor, and human resource employees who accept complaints of abuse or misconduct are required to complete California's Child Abuse Mandated Reporting [General Training](#) module if: (i) the Minor works remotely and the Minor resides in California; or (ii) the Minor performs work in-person for a Stride, Inc. California-based office. This four-hour training is free, and available online.

- California's Child Abuse and Mandated Reporter Training is available at <https://mandatedreporterca.com/>
- Stride, Inc. supervising Minors in corporate role are required to complete the four-hour General Training module only.
- The course is self-paced. The CDSS completion certificate must be shared with the person's manager, and human resources via the Human Resources ticketing system.
- At the end of the training, employees will receive a certificate of completion issued by the California Department of Social Services (CDSS) that the employee must share with their manager.
- Corporate employees or human resource employees are required to complete this training once during their employment with the Company. Employees are, however, encouraged to complete the training again when / if the employee needs a refresher.

Communicating with Minors

All employees are required to adhere to the Company's other policies including, but not limited to, social media, and electronic communications. Communication between adults and Minor employees must be transparent, accessible to supervisors and the Company, appropriate to the circumstances, unambiguous in meaning, and professional in content and tone. Adult employees must respect boundaries consistent with their roles as coworkers, mentors, and supervisors.

Adult employees must restrict one-on-one, electronic communications with individual students, or Minors to accounts, systems, and platforms that are provided by and accessible to the Company unless there is legitimate business purpose for utilizing non-company systems such as a recruiter sourcing a candidate on Tallo. Adult employees are prohibited from texting Minors.

If an adult employee does not have access to a Company-approved communication account, system, or platform because the account, system or platform is down, and there is a time-sensitive or emergency, work-related matter that must be communicated to Minors, the adult may use a personal communication account to communicate this information. The adult must note the date, time, and nature of the contact and make this information available to a supervisor upon request.

Minor employees cannot share private Company information with non-employees. This does not preclude Minor employees from obtaining parent or guardian signatures on required documents, or from sharing information about potential sexual abuse or misconduct with non-employees.

Sexual Misconduct and Abuse Prohibited

Adult employees are prohibited from engaging in sexual misconduct and abuse of Minor employees, dating, making sexual advances, seeking romantic or sexual relationships, having conversations of a sexual nature, and sexual contact. These prohibitions apply without regard to whether an action is consensual.

Reporting Abuse or Neglect

Employees are required to report any case of suspected misconduct or abuse of a Minor to their supervisor or human resources, who must report such information to an attorney in the Stride legal department. This requirement is in addition to the requirements for reporting cases of suspected child abuse or neglect under any mandatory reporting laws.

In addition, adult employees are required to report suspected violations of this policy regarding in-person and electronic communications with Minors to their supervisor or human resources, who must report such information to the Stride, Inc. to an attorney in the Stride legal department.

Investigation and Consequences for Violating this Policy

The Company's designee and authorities as appropriate must investigate all reports of suspected violations of this policy. Inadvertent and innocuous violations of this policy may provide opportunities for additional counseling and training but discipline up to and including termination may be appropriate in any circumstance.

REMOTE WORKER / HOME-BASED WORKER POLICY

Stride ("the Company") considers employment at a remote location to be an acceptable alternative work arrangement in certain situations where the employee and supervisor both find that the job responsibilities can still be met from an off-site location without disruption to the Company. A remote work location allows an employee to work from home, on the road, or in a satellite location for all or part of their regular workweek. It is not an entitlement; it will be evaluated on a case-by-case basis; and in no way changes the terms and conditions of employment with Stride. The Company can determine at any time that a remote work location is not satisfactory to the Company, whether because of an employee's performance, the Company's needs, or any other reason. In such an event, the employee will be expected to work at a Stride location determined by the Company. The employee remains obligated to comply with all Company rules, policies, practices and instructions.

Work Location

Employees who relocate to another city, or state for thirty or more days must notify the Company Human Resources by submitting a ticket to HR Services at servicedesk.k12.com.

Employees must reside within the fifty states, the District of Columbia, or on a US military base (the "Permissible Work Location.") Employees are NOT permitted to work for the Company in a US territory or a foreign country for thirty days or more in one consecutive year.

Employees are permitted to perform their work for the Company as residents of a US military base located in a US territory, or in a foreign country. Conducting work for the Company as an off-base resident in a US territory, or foreign country for thirty days or more in one year is not permitted.

Employees cannot bring a Company-issued computer to countries for work where such activities are prohibited by law. Likewise, employees may not use any computers in countries where such activities are prohibited by law. The Company reserves the right to deny permission to use Company-issued computers, or use other computers for Company work for Information Technology or security reasons.

Managers or business unit leaders with a specific business need to hire, or to retain an employee outside of the Permissible Work Location must contact their Human Resources Business Partner, and the Company's Legal team. Those requests must include a business purpose for the need. The Company may need to retain outside counsel and others for legal and tax advice, visa requirements, technology and security concerns, setting up legal entities, payroll and other business considerations, etc . . .

Without prior approval, the Company will not hire, or retain employees who work outside of the Permissible Work Location for thirty or more days. Managers, and / or business unit leaders must contact Human Resources and Legal if there is a need to terminate a person for violating this policy.

Responsibilities

If a situation arises where a work location change is requested by an employee, the employee must present the request in writing to their immediate supervisor. The supervisor will review the request with Human Resources and together the supervisor and HR will make the decision.

If the Company approves the change in work location, the employee and Company will outline the details of the alternate work arrangement to include work rules, location/office setup, and expectations (to be available and online during business hours, etc.).

The employee continues to perform all normal job responsibilities, including those that may be assigned from time to time. The amount of time the employee is expected to work per day or pay period will not change as a result of the work location. The employee will attend all required meetings (which may include meetings the employee must attend at Stride or other locations), conference calls, and other required work-related activities. The supervisor shall perform all required duties as a supervisor and maintain open communication and discuss with the employee any concerns as they arise.

Employees working at home are expected to schedule work with interruptions kept to a minimum. Employees are expected to maintain professionalism in terms of job responsibilities. The same current high standards of productivity, and outcome of work products are to be maintained by employees working in a telecommuting arrangement.

Under no circumstances will an outside business associate/vendor of the Company, a Company employee or student visit the employee's remote work site without prior written approval by the employee's supervisor.

Tax Liability

It is the employee's responsibility to determine any income tax implications of maintaining a remote or home office area. The Company will not provide tax guidance nor will the Company assume any additional tax liabilities. Employees are encouraged to consult with a qualified tax professional to discuss income tax implications.

Equipment / Tools

The Company may provide specific tools/equipment for the employee to perform their current duties. This may include computer hardware, computer software, telephone, and other applicable equipment as deemed necessary.

Stride equipment is for Stride-related work and projects only. You may not use Company equipment for unlawful purposes or for work for other employers, nor may non-Stride employees use it. Please refer to the Company policy on Computer Guidelines for more information.

Workspace

The employee shall designate a workspace within the remote work location for placement and installation of equipment to be used during the workday. The employee shall maintain this workspace in a safe condition, free from hazards and other dangers to the employee and equipment. Employees must follow proper ergonomic standards for creating a safe, secure, and productive workspace.

Office Supplies

Office supplies will be provided by the Company as needed. Out-of-pocket expenses for other supplies will not be reimbursed unless prior approval of the employee's manager has been received, and the proper processes are followed.

Workers' Compensation / Liability

Worker's compensation liability for job-related accidents will continue to exist for telecommuting employees. Worker's compensation will not apply to non-job-related injuries that might occur in the home.

The Company is not liable for loss, destruction, or injury that may occur in or to the employee's home or remote location that is not under contract with the Company (i.e. offices in Maumee, OH, and Reston, VA). This includes family members, visitors, or others that may become injured within or around the employee's remote work location.

Insurance

Employees should note that some homeowner policies do not automatically cover injuries arising out of, or relating to, the business use of the home. Employees are required to have their homeowners/tenant's liability policy endorsed to cover bodily injury, property damage or theft, and the business use of Stride and personal equipment to all parties

arising out of or relating to the business use of their approved alternate worksite.

Employees who live in rented property should be aware that their lease may not permit business use of the premises.

Dependent Care

During established work hours, the employee agrees that family care demands shall not compete with work except in the case of an emergency. Working at a remote location is not designed to be a replacement for appropriate family care (i.e. children, pets, other adult dependents). Although an individual employee's schedule may be modified to accommodate family care needs with the approval of the employee's supervisor, the focus of the remote work arrangement must remain on job responsibilities, meeting business needs, and individual performance.

Communication

Employees must be available by phone, email, and other pre-determined communication methods during core business hours. (Core hours are defined as 8:00 a.m. through 5:00 p.m.) Employees will be available for staff meetings, and other meetings deemed necessary by the Company.

UNPAID STUDENT INTERNS

Business units who wish to engage students – regardless of age - in unpaid internships must seek the approval of their senior business unit leader, legal, and human resources. All unpaid interns must be 14 or older, or, if greater, the minimum age permitted by state law.

Determining whether a position can qualify as a student's unpaid internship depends upon the unique circumstances of the internship experience. The interns' training must primarily benefit the intern, not the Company. Interns need to receive training from the company focused on their learning and development related to the industry, even if it somewhat impedes the work of the business unit.

Unpaid interns must be the primary beneficiary of the intern-employer relationship. While no single factor is determinative, the following factors are considered in determining the primary beneficiary of the intern-employer relationship:

1. The extent to which the intern and the employer clearly understand that there is no expectation of compensation. Any promise of compensation, express or implied, suggests that the intern is an employee-and vice versa.
2. The extent to which the internship provides training that would be similar to that which would be given in an educational environment, including the clinical and other hands-on training provided by educational institutions.
3. The extent to which the internship is tied to the intern's formal education program by integrated coursework or the receipt of academic credit.
4. The extent to which the internship accommodates the intern's academic commitments by corresponding to the academic calendar.
5. The extent to which the internship's duration is limited to the period in which the internship provides the intern with beneficial learning.
6. The extent to which the intern's work complements, rather than displaces, the work of paid employees while providing significant educational benefits to the intern.
7. The extent to which the intern and the employer understand that the internship is conducted without entitlement to a paid job at the conclusion of the internship.

Unless the above criteria are met, the intern is an employee who must be paid at least minimum wage and earn overtime. Unpaid interns do not receive compensation including, but not limited to, wages, and benefits.

COMPUTER GUIDELINES

Stride, Inc. and its affiliates (collectively referred to as "Stride") issues equipment such as computers, printers, accessories, cellular telephones and personal digital assistants (which may collectively be referred to as "computers" in this policy) to Stride employees and contractors herein called "Users." Users shall exercise appropriate professional judgment and common sense when using Stride's computers, equipment and accessories.

All computers, equipment and accessories are property of Stride, Inc. and are provided to Users for a period of time as deemed appropriate by Stride. As a condition of the use of Stride's computers, Users must comply with all of the following:

- Prior to being issued one of Stride's computers, Users will sign the Computer Acceptance Form.
- Users are expected to take reasonable measures to protect computers, equipment and accessories from damage and theft.
- Users will provide access to any Stride owned computer or accessories they have been assigned upon Stride's request.

General Computer Guidelines

You are responsible for protecting your computer from loss or theft and for protecting the information it contains. These rules are provided to assist in assuring that your computer is secure at all times. All conceivable situations cannot be covered in this document. Users must realize that common sense should be your guide when faced with unusual or unforeseen situations.

General Laptop Guidelines

- Use laptop lock-down cable systems whenever possible.
- Keep your laptop close to you and in sight. Otherwise, keep it locked away securely. It only takes a moment for a thief to walk away with your laptop.
- Never store passwords with your laptop or in its carrying case.
- Other forms of user authentication should be kept separate from your laptop at all times.
- Since the laptop's keyboard and touch pad are permanently attached to the rest of the system, make sure that your hands are clean before using them. It is costly to change a laptop keyboard and/or touchpad that has been damaged by excessive dirt.
- Do not place drinks or food in close proximity to your laptop.

While at the Office

- Laptops should be taken home at night or secured out of sight in a locked drawer, cabinet, or locked overhead compartment of your desk.
- Make sure that the computer is in locked / "log in required" status if you need to walk away from your laptop and it is no longer in your sight.
- Do not leave your laptop unattended if you leave the meeting room. Ensure that someone is designated to remain in the room with any laptops, or that the laptops are secured to immovable objects, or that the meeting room door is locked.

While Traveling in a Personal or Rental Car

- Extreme temperatures can damage a laptop. You should not leave a laptop in an unattended vehicle.
- If you must leave your laptop in an unattended vehicle for a short period of time, always lock your laptop in the trunk of the car. A visible laptop is a target. This should also apply to your daily commute, as you never know when you may decide to make a "quick stop" for milk or coffee.
- On rare occasions when a vehicle may not have a trunk or lockable compartment, the laptop must still be locked in the vehicle and stored out of sight.

In Hotels

- Never leave your laptop unattended in hotel rooms.
- If you leave your room for any period of time, secure your laptop in the room safe. If a room safe is too small or unavailable, lock your laptop in your travel luggage.
- Always attempt to keep evidence that you may be traveling with a laptop out of site.
- Store the carry case and peripherals, such as a mouse and a charger, in your travel luggage.

While Traveling by Air

- Always carry your laptop with you; only place your laptop in checked baggage if required by the airline or airport security. Access the following link to get up-to-date information on restrictions.
- <http://www.tsa.gov>.
- If required by airport authorities, Users may place electronic communication devices and encrypted laptops in their checked luggage.
 - All devices must be powered off before they are packed. Remove the battery from laptops.

- Wrap your laptop in soft foam or bubble wrap to cushion it.
- If possible, pack your laptop in luggage rather than your briefcase. This will make it less conspicuous to thieves.
- Lock all luggage and briefcase compartments with a lock approved by the Transportation Safety Administration (TSA).
- Beware of staged delays at security checkpoints; many thieves use this tactic to steal laptops. Do not send your laptop through the screening devices until you are about to pass through the checkpoint. Keep your laptop close to you at all times. If an overhead compartment within an unobstructed view is not available, consider placing your laptop underneath the seat in front of you.

Stolen Computer

- If your computer is stolen, report it immediately to the local police department and IT Security. Once a police report is filed, provide a copy of the report to Human Resources and IT Security.
- A replacement computer will only be issued after the appropriate documentation has been received by Stride.
- A new computer requisition form will be needed to issue a new computer.

Lost or Damaged Computer

- A computer requisition form will be needed to issue a new computer.

DOCUMENT RETENTION POLICY

Note: The entire Document Retention Policy should be read by every employee and can be found on the Stride HR Intranet. You are responsible for knowing the procedures and acting in accordance with them.

The Company's Document Retention Policy ("DRP") includes a schedule which summarizes both the legally required retention periods and the documents to be retained for business and operational purposes.

1. General Considerations

- a. The DRP identifies general categories of documents (electronic and paper) and specifies how long those documents must be retained by the Company, either based on specific legal requirements or business needs.
- b. In some cases, the same paper documents touch multiple departments and originals and copies appear to be kept by those departments. Department heads with substantial overlapping document production and usage will decide which department will be the ultimate repository for each category of document under the DRP. That department will then be responsible for ensuring that the other departments have deleted their copies pursuant to the required timetables. Each department will be responsible for compliance with the DRP for its own general correspondence and you will be notified by your department head of any actions you are required to take regarding paper documents.

2. Implementation of the DRP Email Policy

- a. Ninety (90) days after being sent or received, the Company will automatically delete any email in your Outlook "Inbox," "Sent Items" and "Deleted Items" folders that are not otherwise retained. Because some emails and associated attachments may be required to be maintained for legal or business reasons, you may need to know how to create sub-folders in your email system to preserve those documents on the Company server for backup.

USE OF COMMUNICATION AND INFORMATION TECHNOLOGY SYSTEMS

It is the intent of Stride to provide the communication and information technology systems necessary for the conduct of its business. Employees are expected to adhere to proper use of all communication and information technology systems. These include, but are not limited to, the telephone, e-mail, instant messages, facsimile, Internet, corporate intranet, voice mail, computer terminals, modems, and systems software. Employees are permitted use of Company property and must comply with Company policies and procedures regarding its use.

The communication systems are owned and operated by Stride and are to be used for the business of Stride. Employees should have no expectation of privacy of any correspondence, messages, or information in the systems. Any Stride employee who is working with a virtual academy, virtual school program, or any other education institution may have their communications subject to public records requests.

Stride reserves the right to access and disclose all such messages sent for any purpose. The issuance or availability of a password or other means of access is intended only to assure appropriate confidentiality of files and information from persons not authorized to access those files or information. They do not suggest privacy with respect to the Company's rights described in this section. All such messages, regardless of content or the intent of the sender, are a form of corporate correspondence, and are subject to the same internal and external regulation, security and scrutiny as any other corporate correspondence. E-mail communications must be written following customary business communications practices, as used in Company correspondence. E-mail communications are official internal Company communications, which may be subject to summons in legal proceedings. Work-related messages should be directed to the affected employee(s) rather than sending a global message to all employees. Stride also reserves the right to monitor, without notice, the activity and accounts of individual users of the Company's technology resources. Such monitoring can include reviewing, copying, accessing or archiving any information, data, files, or materials stored on, transmitted through or created on or through the use of the Company's technology resources.

Stride communication systems shall not be used as a forum to promote religious or political causes, or an illegal activity. Offensive or improper messages or opinions; transmission of sexually explicit images, messages, cartoons, or other such items; or messages that may be construed as harassment or disparagement of others based on race, color, religion, sex, national origin, citizenship status, pregnancy, disability, age, genetic information, military status or status as a Vietnam-era or special disabled veteran, marital status, civil union or registered domestic partner status, gender (including gender identity), sexual orientation or bankruptcy in accordance with applicable federal, state and local laws. is also prohibited on Stride communication systems.

Employees shall not attempt to gain access to another employee's personal communications system and messages. Stride, however, reserves the right to access an employee's messages at any time, without notice to the employee.

Any violation of these guidelines may result in disciplinary action, up to and including termination.

INTERNET CODE OF CONDUCT

Access to the Internet has been provided to staff members for the benefit of the organization and its clients. Every employee has a responsibility to maintain and enhance Stride's public image, and to use the Internet in a productive manner. To ensure that all employees are responsible, productive Internet users and are protecting Stride's public image, the following guidelines have been established for using the Internet.

Acceptable Use of the Internet

Employees accessing the Internet are representing Stride. All communications should be for professional reasons. Employees are responsible for seeing that the Internet is used in an effective, ethical and lawful manner. Internet Relay Chat channels may be used to conduct official Company business, or to gain technical or analytical advice. Databases may be accessed for information as needed. E-mail may be used for business contacts. Employees should always respect the finite capacity of the Company's systems and limit use of the Internet so as not to consume an unreasonable amount of those resources or to interfere unreasonably with the activity of other users. The reasonableness of any particular use will be evaluated in the context of the relevant circumstances.

Unacceptable Use of the Internet

The Internet should not be used for personal gain or advancement of individual views. Solicitation of non-Company business, or any use of the Internet for personal gain, is strictly prohibited. This prohibition includes the use of the Internet for the sale, auction or barter of goods or services for personal businesses (whether incorporated or not), such as consulting businesses, stores, or other sales of goods. Use of the Internet must not disrupt the operation of the Stride network or the network of other users. It must not interfere with your productivity.

Social Networking

Social Networking is an important part of our current culture. We encourage employees to have separate work and personal sites, so that clients, employees, customers, families are not exposed to the personal lives of employees. Additionally, we do not recommend that the personal use of social networking be used during regular business hours.

Communications

Each employee is responsible for the content of all text, audio, or images he or she places on or sends over the Internet. Fraudulent, harassing, or obscene messages are prohibited. All messages communicated over the Internet should have your name attached. No messages will be transmitted under an assumed name. Users may not attempt to obscure the origin of any message. Information published on the Internet should not violate or infringe upon the rights of others. No abusive, profane, or offensive language may be transmitted through the system. Employees who wish to express personal opinions on the Internet are to use non-Company Internet systems.

Software

To prevent computer viruses from being transmitted through the system, there will be no unauthorized downloading of any software. All software downloads require prior management approval.

Copyright Issues

Staff members using the Internet may not transmit copyrighted materials belonging to entities other than Stride. One lawful copy of copyrighted material may be downloaded for use in research. Users are not permitted to copy, transfer, rename, add, or delete information or programs belonging to other users, unless given express permission to do so by the owner. Failure to observe copyright or license agreements may result in disciplinary action from Stride, up to and including immediate termination, or legal action by the copyright owner. Use of the Internet to defeat, interfere with or circumvent any security measures, controls, accounts, record keeping systems or other “standard technical measures” used by copyright holders to identify and protect their rights is prohibited.

Security

All messages created, sent, or retrieved over the Internet are the property of Stride, and should be considered public information. Stride reserves the right to access and monitor all messages and files on the computer system, as deemed necessary and appropriate. Internet messages are public communication and are not private. All communications, including text and images, can be disclosed to law enforcement or other third parties without prior consent of the sender or the receiver.

Harassment

Harassment of any kind is prohibited. The term “harassment” includes, but is not limited to, unwelcome messages with derogatory or inflammatory remarks about an individual’s race, color, religion, sex, national origin, citizenship status, pregnancy, disability, age, genetic information, military status or status as a Vietnam-era or special disabled veteran, marital status, civil union or registered domestic partner status, gender (including gender identity), sexual orientation or bankruptcy in accordance with applicable federal, state and local laws.

Violations

Violations of any guidelines listed herein may result in disciplinary action, up to and including immediate termination. If necessary, Stride will advise appropriate legal officials of any illegal violations.

STRIDE SOCIAL MEDIA POLICY

Stride is committed to building on our culture of accountability, transparency and operating with the utmost integrity and ethics in everything we do. These commitments extend to how we interact with the public and each other and apply to interactions on social media as well. Social media provides a valuable and important way to communicate and share opinions and information. However, the use of social media also presents certain risks and carries with it certain responsibilities. Stride has established the following policy for its employees’ use of social media.

Social media defined Identify yourself

Social media is any means of communicating or posting information that facilitates back and forth communications over the internet, including those that are password protected, open to a limited audience, or are on the “dark web.” Social media applies not only to current “big names” such as Facebook and Twitter, but also other platforms that include a feature for user interactions. Platforms such as YouTube, Flickr, TikTok, Reddit, blogs, personal web sites, chat rooms, message boards, and wikis are all part of social media. As social media advances, the types of personal platforms will change and grow.

Identify yourself

Whether you are an authorized spokesperson for Stride or not, you must identify yourself as a Stride employee in

any posts relating to Stride securities, products and services, regardless of whether you are using your real name, a different name or avatar or even anonymously. The disclosure must be clear (e.g., "I work for Stride.") and conspicuous (e.g., do not use a small font or a color that will make it difficult to read).

Be clear that opinions belong to you

Express only your personal opinions. Never represent yourself as a spokesman for Stride unless you are designated as such by the appropriate supervisor. If the topic of a post is Stride, whether or not Stride is specifically mentioned, include a disclaimer such as "The postings on this site are my own and do not necessarily reflect the view of Stride."

Know whether you can connect with Stride students

You cannot take any action to initiate or accept a connection between any of your social media accounts and any student (other than relatives) in any Stride powered program or for which Stride provides teachers ("Stride Students"). If your job responsibilities with Stride include regular interaction with Stride Students, you may, if permitted under the terms of service of the applicable social media platform and any applicable state regulations and school policies, set up a professional page or account with which to initiate and/or accept connections between yourself and Stride Students enrolled in the school(s) to which you provide service. You cannot use your personal page or account for this purpose. Professional pages and accounts must identify your affiliation with Stride, Inc. If and when you are no longer employed by Stride, you must deactivate or, if possible, delete the professional page or account.

Do not post inappropriate comments

Ensure that your postings are consistent with Stride's Internet Code of Conduct, Use of Communications Systems Policy, Harassment Policy, and all requirements protecting trade secrets and confidential business information. Inappropriate postings that include confidential information regarding Stride's business activities or that may include discriminatory remarks, harassment, threats of violence or similar inappropriate or unlawful conduct will not be tolerated. Stride is committed to our values and principals and knows that employees may be viewed as personifying our corporate brand. While everyone has a right to their personal opinion, this is a reminder that you are a symbol of Stride: Our people, Our Values. With this in mind, Stride will not tolerate any comments that exhibit bigotry, prejudice, misogyny, or hatred within our company or on any social media feeds, even if you specifically state that the views are your own and not those of Stride. Such actions can lead to termination or other disciplinary action.

Know the best way to resolve work-related concerns

You are more likely to resolve work-related complaints by speaking directly with your managers and/or the appropriate human resources personnel than by posting complaints to a social media outlet. We encourage you to contact those people. Nevertheless, if you decide to post complaints or criticism, and you post anything that could be viewed as malicious, obscene, threatening, bullying or intimidating, or that might violate any Stride policy or the Employee Handbook, you could be subjected to discipline up to and including termination. Examples of such conduct might include offensive posts that could harm someone's reputation or posts that could contribute to a hostile work environment on the basis of any status or characteristic protected by law or Stride policy.

Do not lobby or campaign in your capacity as a Stride employee

Do not engage in lobbying or political campaigning in your capacity as a Stride employee. You should take measures to ensure that there is no perception of Stride involvement or support of your personal lobbying or political activities, such as by posting a disclaimer to the effect of "the views expressed here represent my own and not those of Stride." You may never use Stride equipment, assets or work time for such activities.

Respect the rights of others

Do not use, copy, or publish intellectual property belonging to Stride or any other company or person unless you have the legal right to do so. Examples include corporate brands, logos, trademarks, photos, essays, video, music, and other proprietary information. Always respect the privacy rights of other persons. Do not share any personal information on social media that could identify a student.

Be honest and accurate

Make sure you are always honest and accurate when posting information or news about Stride, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched.

Be mindful that others can gain information by looking at multiple social media platforms

While individual posts may not disclose confidential information in themselves, you should be mindful of what confidential information can be gained by looking at the information you post across social media platforms or over a

period of time. Consider the following example: Employee is identified as a Stride employee on LinkedIn. The employee posts on Twitter that she is anxious to meet with a vendor to evaluate exciting new software for her job. Finally, the employee later “checks in” on Facebook at the headquarters of the vendor. While none of the individual posts may have contained confidential company information, someone could look at all three together and conclude that Stride was considering a software purchase from the vendor. In some situations, that information could be a disclosure of confidential information. Therefore, employees should keep in mind the information posted on the internet collectively, and not simply post-by-post.

Turn in your usernames and passwords for Stride accounts

Particularly (but not only) if you are in marketing, school services or Galvanize, you may be responsible for social media accounts for the Company or for a Stride-powered program. Even though you may have the username and password for the account, that does not mean that the account is yours. When you leave the Company, you are not to delete the account or any part of it and you must turn over the username and password to your supervisor. If you are a supervisor receiving that information, you must immediately change the username and password.

SOLICITATION AND DISTRIBUTION OF LITERATURE

It is the intent of Stride to maintain a proper business environment and prevent interference with work and inconvenience to others from solicitations and/or distribution of literature.

Group meetings for solicitation purposes, distributing literature, or circulating petitions in work or sales areas are prohibited, unless approved by your Executive Management Team and the Human Resources Department as a Company-sponsored event. The following guidelines will apply throughout Stride.

- Employees will not engage in any solicitation of other employees for any purpose whatsoever during working hours or in work areas.
- Stride facilities may not be used as a meeting place that involves solicitation and/or distribution of literature.
- Trespassing, soliciting, or distributing literature by non-employees is prohibited on Company premises.

CORPORATE EXPENSE/TRAVEL REIMBURSEMENT

Policy Introduction

Business expenses will be reimbursed by Stride if expenses are:

- Reasonable
- Appropriately documented
- Properly authorized
- Within the guidelines of Stride’s Corporate Travel and Expense policy located on the Human Resources Internal Documents folder of Stride’s Intranet.

Employees must have a documented business justification for all expenses submitted for reimbursement. Non-travel related expenses must follow Stride’s corporate procurement policies for all technology and office supply purchases and should not be purchased through expense reimbursement. Employees must submit only one trip per expense report. Business justification must be clarified in the “Purpose” section of the expense report, and as needed to provide additional information about any business receipt. To the extent that federal or applicable state law requires some additional reimbursement, Stride will comply with those laws.

Travelers must follow the guidelines of this policy in making travel arrangements that are fiscally responsible for Stride while maintaining safe and secure travel. In addition, to the specific transportation, lodging and car rental policies set forth in Stride’s Corporate Travel and Expense policy, Stride provides travelers with specific spending guidelines. Failure to comply with the policy may result in the denial of a reimbursement request, cancellation of a company-issued credit card and may result in disciplinary action, up to and including termination.

All travel reservations (for example, air, lodging and car) must be made through the designated booking tool, unless pre-approved by a Senior Vice President or above. Employees may accumulate personal frequent flier points for business travel; however, travel decisions must not be booked based on personal frequent traveler program.

The Corporate Travel and Expense policy will be administered in compliance with the requirements of the Americans with Disabilities Act (ADA). Should special travel accommodation be required, employees are encouraged to work with the HR Business Partner to identify the necessary accommodations.

NOTE: The Stride Expense and Travel Policy is applicable to Stride Corporate employees only. Stride-powered school Instructional Staff should follow their respective School Expense and Travel policy.

PORTABLE ELECTRONIC DEVICE USE IN VEHICLES

This policy applies to any portable electronic device ("PED") that makes or receives phone calls, leaves messages, sends text messages, has the ability to search the Internet, or downloads and allows for the reading of and responding to email whether the device is Company-supplied or personally owned (and whether or not reimbursed by the Company for any costs related to the PED).

An employee is prohibited from 1) using a PED while driving for Company-related business, and 2) when using (whether or not for business-related purposes) a Company-supplied PED while driving any vehicle. This policy applies whether or not the PED is used with a hands-free device. This prohibition on use includes, but is not limited to, text messaging, conducting Internet searches, receiving or responding to email, downloading, uploading, or phone calls (per state or local regulations). Use of Company owned devices for personal business is discouraged.

The Company recognizes that other distractions occur during driving, however curbing the use of PEDs, while driving, is one way to minimize the risk, for our employees and others, of accidents. Therefore, employees should stop their vehicle in a safe location so that they can safely use a PED.

BENEFITS AT A GLANCE - Updated 05/2022

Stride provides benefits for Eligible Employees. The information provided here is intended to be a high-level overview. Information about eligibility, rates, and the current suite of benefits is found at <http://k12inc.sharepoint.com> under the Human Resources Group – Benefits tab.

- Eligible Employees are defined as:
 - Full-time regular employees, so those who work 30 hours or more each week as noted in this handbook's Classification of Employment section; and
 - Part-time regular employees, so those who work less than 30 hours per week as noted in this handbook's Classification of Employment section.
 - Eligible Employees exclude:
 - i. Seasonal employees (except that they are eligible for the Company's 401(k) after working 1,000 hours); and
 - ii. Interns.
- Eligible new hires have **30 calendar days to enroll in benefits** and make their elections. Calendar days are measured from the new hire's first day recorded in UltiPro, Stride's Human Resource Information System. After those 30 calendar days pass, new hires cannot enroll in benefits and are not eligible for benefits until the Company's next open enrollment period. Open enrollment occurs in the fall of the calendar year. All benefits are effective on the eligible employee's first day of employment. There is no waiting or probationary period. Enroll [via Stride's UltiPro](#).
- Eligible Employees who have a "Qualifying Event" during a plan year are permitted to enroll in, or make changes to existing Stride benefits within **30 calendar days from the date of a Qualifying Event**. Qualifying Events include marriage, divorce, birth, death, adoption, and spouse's or Domestic Partner's loss of coverage. If changes are not made within 30 calendar days of a Qualifying Event, employees must wait until the next open enrollment period to enroll, or make changes to their benefits.
- Dental, vision, and medical benefits will be available to Eligible Employee's spouses, Domestic Partners, and dependent children up to the end of the calendar year in which they turn 26, including dependent children of Domestic Partners. Dependent children may be eligible for additional benefits, and should review the Benefits section on Stride's Intranet.
- Social Security information will be needed and varies based on the benefits elected.

- Employees are responsible for all missed benefit premiums that would have been taken retroactive to the employee's hire date or qualifying life event date. Additionally, employees on leaves of absences are required to pay all missed benefit premiums that weren't taken while the employee was on leave on the first paycheck upon returning to work. If the employee does not have enough wages to recover the missed premiums, the missed premiums will continue to be deducted on future paychecks until the missed premiums are paid in full.
- Current Providers (subject to change):
 - CIGNA: Medical & Prescription, Dental
 - Vision Service Plan (VSP): Vision insurance
 - Chard Snyder: Dependent Care, Healthcare Flexible Spending Accounts, and Transportation Flexible Spending Accounts
 - MetLife: Life and Accidental Death and Dismemberment (AD&D), Short-Term Disability (STD), Long-Term Disability (LTD), Hospital Indemnity, Accident Insurance, and the Employee Assistance Program
- 401(k) – Empower Retirement - All employees are automatically enrolled upon hire at 3% after 30 days of employment if the employee makes no election. If you are eligible to participate in a state retirement plan (e.g., SERS, PSERS, STRS), you are not eligible for the 401k plan. Employer match is 50% up to the first 5% of employee contributions.
 - Employer match vests 100% after one (1) year of service. Employee contribution is always fully vested.
 - Employees can contribute either through pre-tax salary deferrals or post-tax Roth contributions. Contribution and investment changes can be made at any time
- COBRA: You will be notified by the plan administrator, currently Chard Snyder (CS), and given additional information regarding the continued coverage option upon separation from Stride. Should you elect to continue coverage on an after-tax basis, you will need to complete the election forms and return them to your new employer within 60 days of separation or from the date you receive your COBRA continuation rights notification. Chard Snyder can be reached at 1-888-993-4646, email cobra@chard-snyder.com or online at www.chard-snyder.com.

Employees may contact [the benefits team by submitting a ticket to HR services at servicedesk.k12.com](#). Employees should also see the Benefits page on SharePoint for information about the providers.

DOMESTIC PARTNER POLICY FOR BENEFITS

The availability of benefits coverage for domestic partners and their children is an extension of the Company's efforts to maximize the effectiveness and value of the benefits program.

Stride defines same-or opposite-sex domestic partners as two people who:

1. Are living together in a committed exclusive relationship of mutual caring and support for a period of at least six (6) months;
2. Intend for the domestic partnership to be permanent;
3. Are financially interdependent such that they are jointly responsible for the common welfare and financial obligations of the household, or the non-employee domestic partner is chiefly dependent upon the employee for care and financial assistance;
4. Are neither legally married to any other individual, and if previously married, a legal divorce or annulment has been obtained or the former spouse is deceased;
5. Are mentally competent to enter into a contract according to the laws of the state in which they reside;
6. Are at least 18 years of age and are old enough to enter into marriage according to the laws of the state in which they reside;
7. Do not have a blood relationship that would bar marriage under applicable laws of the state in which they reside if they otherwise satisfy all other applicable state marriage requirements; and
8. Are not in a relationship solely for the purpose of obtaining benefits.

Dependents of Domestic Partners

For benefit coverage, eligible dependents include children under age 26, who are:

- Biological, legally adopted, or stepchildren, including those who do not live with you, but for whom you have parental rights or assume at least 50% of the financial responsibility for the children.

Tax Implications

Please note that to the extent that coverage for a domestic partner or child of a domestic partner is financed by Stride Inc., the employee is taxed on the fair market value of the coverage at group rates. The value of the coverage is reported as income on the employee's W-2 Form, and Stride, Inc. withholds Federal income tax, state or local income tax (as applicable), and Federal Insurance Contribution Act (FICA) tax on that imputed income. Nontaxable health and dental coverage can only be provided to an employee's legal spouse or dependent as defined Section 152 of the Internal Revenue Code.

Process

To enroll your domestic partner for Stride, Inc. benefits, you simply need to return an **Affidavit of Domestic Partnership** form, available on the Stride intranet at <http://k12inc.sharepoint.com>. Once your application for domestic partnership is approved, this will be a qualifying life event.

PARENTAL LEAVE BENEFITS

Stride provides Parental Leave Benefits for eligible absences. These benefits include two types of plans:

1. **Childbirth Leave:** This is a paid benefit for the recovery from the birth of a child. Eligible employees on Childbirth Leave will receive 100% of their pay for up to eight weeks, offset by disability pay if a Short-Term Disability (STD) claim is approved by Stride's vendor.
2. **Child Bonding Leave:** This is a paid benefit for new parents of a child born or adopted. Eligible employees on Child Bonding Leave will receive 60% of their pay for up to four weeks if a FMLA/Stride Non-FMLA claim is approved by our vendor. Leave must be taken within the first year after the birth or adoption of a child.

Employees must meet all of the following eligibility requirements:

- Employee must be a 75% full-time employee working at least 30 hours per week at the commencement of the leave
- Employee must have either:
 - A minimum of one year of service with Stride or its affiliates; or
 - Be a full-time employee who was rehired within one year of termination AND who has at least one year of service (prior and current service is combined)
 - Time served as a contractor or as a board employee of a Stride-Powered School is considered toward eligibility for Stride's Parental Leave Benefits.
- Applicants for Childbirth Leave are required to submit all documentation required for Short-Term Disability (STD) to our vendor, and be approved for STD.

Information about initiating the process is available on Stride's Intranet Human Resources section Benefits tab.

WORKERS' COMPENSATION INSURANCE

Workers' Compensation insurance provides payment of medical treatment and related expenses, as well as compensation in the event an employee is unable to work due to a work-related accident or illness. Employees are covered by workers' compensation insurance provided by Stride and based on state regulations. To be considered work-related, the injury or illness must arise from or occur in the course of employment.

The amount of benefits payable and the duration of payment depend upon the nature of the employee's injury or illness, the date of injury, the employee's earnings, and the jurisdiction. All medical expenses incurred in connection with an on-the-job injury or illness and disability payments are paid in accordance with applicable state law.

If an employee is injured or becomes ill on the job, the employee must immediately report such injury or illness to the on-site supervisor. This ensures that Stride can help obtain appropriate medical treatment. An employee's failure to follow this procedure may result in the appropriate workers' compensation report not being filed in timely accordance with the law, which may delay benefits in connection with the injury or illness.

Employees may file a claim by contacting Gallagher Basset Captive at **1-877-849-2183**.

Employees need the following information when contacting Stride's Workers Compensation Carrier

- Policy Number: 001437
- Effective date: 12/31/2020

In the event of a serious or fatal injury, dial 911 in order to receive medical assistance and report the incident immediately to the toll-free reporting line above.

Employees on Workers Compensation are responsible for keeping their supervisor informed of their work status. When an employee is able to fully return to work, written clearance from the treating medical professional must be provided to Human Resources.

EMPLOYEE ASSISTANCE PROGRAM (EAP)

Stride cares about the health and well-being of its employees and recognizes that a variety of personal problems can disrupt their personal and work lives.

MetLife, Stride's EAP, is available to all employees and their immediate family members offering problem assessment, short-term counseling, and referral to appropriate community, online, and private resources. There is no cost for employees to contact the EAP.

The EAP is strictly confidential and is designed to safeguard employees' privacy and rights. Information given to the EAP counselor may be released only if requested by an employee in writing. Program details are available at Stride's Intranet Human Resources – Benefits tab, or by contacting MetLife.

Employees can contact the EAP at 1.888.319-7819 available 24/7. Online support, advice, or resources is available at metlifeeap.lifeworks.com. Log in with the user name: [metlifeeap](http://metlifeeap.lifeworks.com) and password: [eap](http://metlifeeap.lifeworks.com).

EMPLOYEE DISCOUNTS

Stride provides several employee discounts. Information about the current discounts are available on the Human Resources Group of Stride's Sharepoint / Intranet. As of June 2019, these discounts include access to a third-party site to obtain discounts on tickets, and shopping; employee discounts on Stride courses and programs; and tuition discounts to selected universities. These examples are not exhaustive, and subject to change. Employees must refer to Stride Employee Discounts Policy for current relationships, and more information.

EMPLOYEE REFERRAL PROGRAM

The employee referral program hopes to bring the highest caliber of talent to Stride. It enables and empowers employees to participate in the recruiting process and to work with talented professionals from their network who can help make significant strides in our business. Information about Stride's employee referral process, compensation, eligibility, and rules is found in the Human Resources section of the Stride intranet.

TUITION ASSISTANCE BENEFIT PROGRAM (TAB)

We believe in supporting the ongoing education and training of its employees. To demonstrate this belief, Stride offers a Tuition Assistance Benefit ("TAB") for degree courses, continuing education courses and certain certifications to further invest in our employees.

Eligibility

Employees must meet the following eligibility requirements in order to receive reimbursement under the TAB program:

1. The employee must be classified as a 75% full-time Stride employee working at least 30 hours per week at the time of reimbursement. Part-time employees are not eligible for reimbursement under this program.
2. The employee must work for Stride or one of its affiliates for one continuous year BEFORE the start date of the course. Rehired employees who have been inactive less than one (1) year and had one year of continuous service prior to termination or a combined year of service before termination and after rehire are eligible for

reimbursement upon rehire. Rehired employees who have been inactive for a year or more will be required to complete one year of continuous service after their rehire date in order to be eligible for reimbursement again. Time served as a contractor or as a board employee of a Stride-Powered School is considered toward eligibility for Stride's Tuition Assistance Benefit.

3. The employee must be a current Stride employee in good standing, meaning that the employee has no Written Warnings or been on a Performance Improvement Plan (PIP) in the 12 months prior to reimbursement. The employee must remain active through the payment date of the tuition assistance or the employee shall forfeit their rights to any reimbursement for courses completed after termination, unless the termination reason is for layoff.

Eligible Expenses and Reimbursement Amounts

Eligible employees for the TAB program may receive up to the following amounts per calendar year (January 1 – December 31) for the applicable course or certification:

- Undergraduate or Graduate Degree Courses – Up to \$5,250 per calendar year if it is taken as part of an employee's degree program from an educational institution that is accredited by an Institutional Accreditor recognized by the U.S. Department of Education. A list of those Institutional Accreditors can be found here: <https://ope.ed.gov/dapip/#/agency-list>.
- Continuing Educational Expenses – Up to \$1,000 per calendar year. Reimbursement includes courses taken at an accredited trade, vocational or business school that is accredited by an Institutional Accreditor recognized by the U.S. Department of Education or through a professional association. The course must be part of a sequence that result in the employee receiving or maintaining a certification or job-related designation (i.e. PHR/SPHR, CPA, J.D., PMP). Any tests required for certifications are also reimbursable as part of this category.
- Certifications and Endorsements – Up to \$500 per calendar year. This includes teacher and principal certifications and endorsements, as well as any professional certification and/or professional organization memberships an employee may pursue (i.e. PHR/SPHR, PMP, CPA, etc.). This category only covers the cost of the application fee. Fingerprinting costs are not reimbursable under this program. Note: If the program does not result in a degree, it will fall under this category (i.e. Principal Certification/Licensure where no undergraduate or graduate degree is obtained).

All requested courses, conferences, and/or certifications must also be job related as it pertains to the employee's present work at Stride, Inc.

Tuition, costs of required books and required course fees are reimbursed 100% up to the TAB maximum as defined above as long as the employee receives a grade of C or above, "pass," or "credit" AND the expense is submitted for approval and reimbursement according to the process requirements outlined in this document. All required course fees must be specifically outlined in the course materials as a requirement for taking the course in order to be reimbursable. University fees, parking fees, application fees, except for those required for professional certification, calculators, personal computers, dictionaries, typing fees, binding fees, reproduction fees, late registration fees, or any other costs are not covered. The only exception to this exclusion is that the resource fee required for courses through the American College of Education is considered reimbursable.

Employees must submit the following items to obtain reimbursement:

- Detailed account breakdown that shows fees vs. tuition costs specific for each course or expense.
- Proof of payment.
- Successful course completion, including grade.

How to Apply and Receive Reimbursement

1. The employee must complete the Tuition Assistance Benefit Application and classes must be pre-approved by the employee's supervisor. Applications without both the employee's and supervisor's signature will be denied.
2. The completed Tuition Assistance Benefit Application must be submitted to the Benefits Team [via](mailto:servicedesk.k12.com) HR Services at servicedesk.k12.com for final pre-approval no less than twenty (20) days prior to the start date of the class. The completed application may be submitted by either the employee or the supervisor; however, it is the employee's responsibility to ensure the form is sent to the Benefits Team timely. Any applications submitted late will be denied.
3. For degree & continuing education courses/conferences, a copy of the course/conference description must

be sent in with the completed Tuition Assistance Benefit Application for evaluation and pre-approval by the Benefits Team. The sequence or listing of courses needed to complete the degree requirements must also be attached. The listing of course requirements can be copied from the college/university catalog or developed with an academic advisor (if the latter, it must be signed by the academic advisor). Reimbursements for books must be accompanied by the course syllabus showing that the book is required. Stride reserves the right to request additional documentation regarding any eligible expense as it deems necessary.

4. Applications not pre-approved will not be accepted as part of the program. Employees should keep a copy for their own records.
5. After the class is completed, employees must submit the required documents detailed above to the Benefits Team [by](#) submitting a ticket to HR Services at servicedesk.k12.com within sixty (60) days of the end of the class in order to be eligible for reimbursement. This reimbursement will be paid out according to normal payroll practices and as soon as administratively feasible.
6. Reimbursements must be made by the last pay date of the calendar year in order to qualify for that year's tuition allowance. A notice will be sent to any participant with courses ending towards the end of the year with the due date for all items should they want to receive reimbursement in the current calendar year. Anything submitted after the payroll cut-off date for the last pay date of the calendar year will be applied to the next calendar year's allotment. You can access the payroll calendar, including the payroll cut-off date, on the Stride Intranet/Homeroom.
7. Any reimbursement will be reduced by any financial aid received, except for loans or other financial aid that must be paid back. Grants and scholarships are examples of financial aid that would reduce a reimbursement under this program.

Any employee who receives tuition assistance through this program and subsequently terminates employment for any reason other than layoff within two (2) years of receiving reimbursement will be required to pay back any reimbursement received under this program. The employee is required to pay back any reimbursement received in the calendar year in which the employee terminates and half of any reimbursement received in the calendar year prior to the year in which the employee terminated. For example, Jack Smith is reimbursed \$1,000 under the tuition assistance benefit in 2017 and another \$1,000 in 2018. Jack resigns in October 2018. He will be required to pay back a total of \$1,500 (\$1,000 for 2018 and 50%, or \$500, for 2017). Stride, Inc. will attempt to recoup as much as possible from the employee's final paycheck. Any remaining balance owed will be included in a letter sent to the former employee. The former employee will have three (3) months from the date of this notice to repay any assets as noted in the letter. If full repayment is not timely received, the former employee will also be required to pay all costs of collection, including attorney's fees.

Additional Information

Classes and study time are expected to be on the employees' own time, except when the employee is required to attend the class by Stride and the time is approved by the employee's supervisor. Stride, Inc. reserves the right to clarify or change these terms at any time and while it hopes to communicate any changes prior to their effective date, reserves the right to make changes with or without notice. Please always check the Stride Intranet Human Resources Group and Benefits tab for the most up to date policy. Please contact the Benefits Team by submitting a ticket to servicedesk.k12.com if there are any questions.

ADDENDA ONE: LOCATION-SPECIFIC PAID TIME OFF POLICIES

Note: Whenever an applicable state or local law requires benefits (as may be the case with respect to family and medical leave, paid time off, jury duty or other issues) or provides additional employee protections, Stride will comply with those state and local specific requirements.

Please review the corporate Time Off Policy for more details. All requests for time off MUST be pre-approved by your manager.

GEORGE WASHINGTON UNIVERSITY ONLINE HIGH SCHOOL (GWUOHS)

This policy is FOR GWUOHS teachers and advisors. (Counselors began following Stride's Corporate PTO plan on January 1, 2019.)

Employees who work an average of 30 or more hours per week:

- ✓ Seventeen (17) PTO days will be awarded every August 1st. This time does not roll-over from year to year and it does not accrue.
- ✓ Employees working in CO, MT and OR: Notwithstanding the above, beginning on July 31, 2018, and on each July 31 thereafter, any remaining PTO time that you have on July 31 will be rolled over to August 1 and you will be awarded sufficient additional PTO, if necessary, so that the total of the rolled over PTO and the additional PTO will equal seventeen (17) PTO days.
- ✓ Employees working in CA: Notwithstanding the above, beginning on July 31, 2018, and on each July 31 thereafter, any remaining PTO time that you have on July 31 will be rolled over to August 1 and you will be awarded sufficient additional PTO, if necessary, so that the total of the rolled over PTO and the additional PTO will equal twenty-two and two thirds (22.67) PTO days (or 181.34 hours PTO).

Employees who work an average of less than 30 hours per week:

- ✓ Six (6) days PTO days will be awarded every August 1st.
- ✓ Employees working in CO, MT and OR: Notwithstanding the above, beginning on July 31, 2018, and on each July 31 thereafter, any remaining PTO time that you have on July 31 will be rolled over to August 1 and you will be awarded sufficient additional PTO, if necessary, so that the total of the rolled over PTO and the additional PTO will equal six (6) PTO days.
- ✓ Employees working in CA: Notwithstanding the above, beginning on July 31, 2018, and on each July 31 thereafter, any remaining PTO time that you have on July 31 will be rolled over to August 1 and you will be awarded sufficient additional PTO, if necessary, so that the total of the rolled over PTO and the additional PTO will equal eight (8) PTO days.

All employees:

- ✓ PTO may be used for vacation, sick leave or for personal reasons. Except in cases of an illness where a doctor's note might be required, use of PTO is to be pre-approved by the school's Executive Director or that person's designee.
- ✓ PTO is not paid out upon leaving employment by Stride, except for employees who work in CA, CO, IL, or MA.
- ✓ There will be no approved PTO immediately before or after school holidays (exceptions to this must be approved in writing by the school's Executive Director).

Holidays:

- ✓ Employees will be given up to 9 paid holidays. Those holidays include the holidays provided by Stride to its corporate employees and the Wednesday before Thanksgiving day.
- ✓ In addition to the above paid holidays,
 - Winter Break: GWUOHS provides up to 7 days off for winter break (in lieu of that provided by Stride for its corporate employees).
 - Spring Break: GWUOHS provides up to 5 days off for spring break. These dates will be presented to you annually by the leadership team;.
 - GWUOHS will determine each year whether academic support to students is needed over the break, and will provide it if necessary.

This policy is subject to change at any time at the discretion of Stride.

INTERNATIONAL ACADEMY (iCAD)

This policy applies to iCAD teachers. All other iCAD employees follow the corporate PTO and holiday policies.

Employees who work an average of 30 or more hours per week:

- Seventeen (17) PTO days will be awarded every August 1st. This time does not roll-over from year to year and it does not accrue.
- Employees working in CO, MT and OR: Notwithstanding the above, any remaining PTO time that you have on July 31

will be rolled over to August 1 and you will be awarded sufficient additional PTO, if necessary, so that the total of the rolled over PTO and the additional PTO will equal seventeen (17) PTO days.

- Employees working in CA: Notwithstanding the above, any remaining PTO time that you have on July 31 will be rolled over to August 1 and you will be awarded sufficient additional PTO, if necessary, so that the total of the rolled over PTO and the additional PTO will equal twenty-two and two-third (22.67) PTO days (or 181.34 hours PTO).

Employees who work an average of less than 30 hours per week:

- Six (6) PTO days will be awarded every August 1st. This time does not roll-over from year to year and it does not accrue.
- Employees working in CO, MT and OR: Notwithstanding the above, any remaining PTO time that you have on July 31 will be rolled over to August 1 and you will be awarded sufficient additional PTO, if necessary, so that the total of the rolled over PTO and the additional PTO will equal six (6) PTO days.
- Employees working in CA: Notwithstanding the above, beginning on July 31, 2018, any remaining PTO time that you have on July 31 will be rolled over to August 1 and you will be awarded sufficient additional PTO, if necessary, so that the total of the rolled over PTO and the additional PTO will equal nine (9) PTO days.

All employees:

- PTO may be used for vacation, sick leave or for personal reasons. Except in cases of an illness where a doctor's note might be required, use of PTO requires prior approval by your supervisor.
- PTO is not paid out upon leaving employment by Stride, except for employees who work in CA, CO, IL, MA, MT or OR.
- No PTO time will be approved for the month of August. No more than 5 consecutive days will be approved during the time period of September through May (exceptions to this must be approved in writing by the school's Executive Director). There will be no approved PTO immediately before or after school holidays (exceptions to these restrictions must be approved in writing by the school's Executive Director).

Holidays

Employees will be given up to 9 paid holidays. Those holidays include the holidays provided by Stride to its corporate employees as designated each year, and the Wednesday before Thanksgiving Day.

In addition to the above paid holidays, iCad provides up to 7 days off for winter break (in lieu of that provided by Stride for its corporate employees) and 5 days off for spring break. Specific dates to be provided in writing for each year.

*This policy is subject to change at any time at the discretion of Stride.

ALL OTHER SCHOOLS

Sick/Personal Time Off

Full-time teachers, advisors, paraprofessionals ("para"), and guidance counselors (who are not following corporate PTO plan) are awarded ten (10) days of sick/personal time. This time does not accrue with tenure of employment; it does not roll over from year to year and is not paid out upon your departure from employment. Sick/personal time is a benefit that is refreshed annually (based on a calendar year) and is not carried over year to year. Unused sick/personal time is not paid out upon termination.

- Employees working in Colorado, Montana, and Oregon: Notwithstanding the above, any remaining sick/personal time that employees have on July 31 will be rolled over to August 1 and you will be awarded sufficient additional sick/personal time, if necessary, so that the total of the rolled over sick/personal time and the additional sick/personal time will equal ten (10) sick/personal days.
- Employees working in California: Notwithstanding the above, any remaining sick/personal time that you have on July 31 will be rolled over to August 1 and you will be awarded sufficient additional sick/personal time, if necessary, so that the total of the rolled over sick/personal time and the additional sick/personal; time will equal thirteen and one-third (13.33) sick/personal time days.

Sick/Personal is subject to blackout periods designated and enforced by school leadership based on individual school needs if applicable. All requests for time off should be directed to the employee's supervisor, and school policies and procedures should be followed in requesting and reporting time off. Employees must notify their immediate supervisor as soon as they know they will not be reporting to work. (Text messages are not an appropriate way to inform Stride that you are taking a sick day.)

If unexpected time off is more than three (3) consecutive days, you might be required to provide a note from a medical professional. Additionally, you might be given (and may always request) information about contacting FMLA Source for a leave of absence and/or the Employee Assistance Program (EAP) to ensure you understand the options available to help you get healthy.

All employees who work less than full-time receive 50% of the plan.

Your balances can be found on the HR portal (www.k12.com/hrportal) by choosing Menu, Myself, Benefits, and then PTO plans.

Holidays and Breaks

Holidays are designated individually by school leadership each school year as Summer Break, Winter Break, Spring Break, and / or school or state specific holidays. These days are in addition to Stride's holidays. Please refer to your specific school schedule for detailed information. School-based employees will not see their break periods, such as Summer Break, tracked in UltiPro because these Breaks are Company holidays for those school-based employees.

ADDENDA TWO: ENROLLMENT AND SERVICE AND SUPPORT ATTENDANCE POLICY FOR NON-EXEMPT (“HOURLY”) EMPLOYEES

Paid Time Off (PTO) Policy

Employees follow Stride’s paid leave policies as outlined earlier in this handbook. Employees must adhere the following attendance policies.

Scheduling Paid Leave

Absence events fall into two separate categories: Planned, and Unplanned. Employees are responsible for understanding the differences between the two types of absences, and the impact of each absence.

Planned Absence

A planned absence event occurs when an employee notifies the Company and Workforce Management (“WFM”) at least 48 hours in advance that time off will be taken. An Employee must submit a time off request via Calabrio for a scheduled absence. The request must be approved prior to the date/time the Employee plans to be away from work. WFM is responsible for coordinating scheduled absence events within each department and time interval to avoid conflicts and ensure adequate coverage. Planned absence events are processed on a “First Come, First Served” basis.

It is the employee’s responsibility to ensure that time off is available when available when requesting time away from work. It is also the responsibility to check if their requested time off has been approved before it is taken.

In the case of heavy workloads or other business reasons, WFM may deny an employee’s request for time off or require an employee to change his/her/they time off to a more convenient time.

Unplanned Absence

All time away from work is strongly encouraged to be planned with as much notice as feasible. In instances where planning an absence is not possible, the time away from work is considered unplanned.

An unplanned absence occurs when an employee has an unexpected illness, emergency, or is otherwise absent, late, or must leave early without having been previously approved for a scheduled absence. The scheduled absence. The employee must contact his or her management by email (text or voicemail are not preferred) and leave a message on the call out line no later than 2 hours prior to their shift on the day he or she needs to be away from work or as soon as is feasible for a late/leave early incident. The type of absence must be recorded as part of the message (ex. FMLA, ADA, Bereavement, Jury Duty etc.) for proper documentation and processing.

When calling the call out line, please state the following information:

- Full Name
- Team
- Scheduled shift
- Reason for absence or tardiness
- Any specific leave type if applicable
- Contact phone number
- The call out line phone number is 855-864-7006

In the instance of an unplanned absence or an unapproved planned absence, attendance points will be assessed. Assessed points are subject to review and appeal on a case-by-case basis by providing relevant documentation to your Supervisor and/or HRBP.

Unapproved absences which occur on more than three consecutive days may be subject to review as a singular occurrence if the employee provides documentation for the absence. An example of approved documentation is a doctor’s note for the employee or an immediate family member. Documentation for review by the HRBP should be provided to your Supervisor for submission to the HRBP via the Point Review process. Supervisors or Managers may request a doctor’s note after one day of absence or if a pattern is noticed.

- An “immediate family member” for purposes of this policy includes spouses, registered domestic partners or civil union, children (if a dependent or under the age of 21), and parents (including step-parents and parents-in-law).

If an employee does not have enough paid leave available to cover missed time, the portion of the missed time for which PTO was unavailable will be unpaid.

Unplanned absences of three (3) or more consecutive days without notice to the direct supervisors and/or the call out line will be considered “job abandonment” which is considered a voluntary resignation.

Unplanned absences before and after a company paid holiday will result in forfeiture of holiday pay.

If a pattern of absenteeism/tardiness is noticed, management reserves the right to request further details regarding unplanned absences and/or initiate corrective actions as merited.

WFM must approve all paid leave. If the time away from work is not approved, it will count as an Incident. Points will be assigned as follows:

3 minutes to 120 minutes missed from scheduled shift:	= ¼ Occurrence
121 minutes to 240 minutes missed from scheduled shift:	= ½ Occurrence
241 minutes to 1 full 8 hour scheduled shift missed:	= 1 Occurrence
1 full 10 Hour Shift:	= 1.25 Occurrence(s)

Any unplanned time away from your scheduled shift, will be considered unacceptable absenteeism/tardiness and may result in disciplinary action up to and including termination. While the Company will generally take disciplinary action in a progressive manner, it reserves the right, at its sole discretion, to decide whether and what disciplinary action will be taken in each situation. The decision to terminate employment will be reviewed and approved by Management and Human Resources to ensure consistency.

Unscheduled leave is intended to be used for unexpected illnesses or emergencies only. The Company may monitor your attendance for unacceptable patterns of absences, lateness Issues or early departures. If the Company determines that you are abusing these guidelines, disciplinary actions up to and including termination may result regardless of the number of unscheduled absence points you have accrued.

Reporting Procedures

Reporting paid leave is the responsibility of the employee, and his or her management. Management must record paid leave for each employee as well as attendance points of unapproved absences.

ADDENDA THREE: TECH ELEVATOR HOLIDAY SCHEDULE

Tech Elevator and Med Certs employees receive eight fixed holidays each year, and four floating holidays. The fixed holidays for 2022 are:

- New Years Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Day after Thanksgiving
- Christmas Eve
- Christmas

When a holiday falls on a Saturday or Sunday, another day may be treated as the holiday.

In 2023, Tech Elevator will observe United States Federal Holidays. When a holiday falls on a Saturday or Sunday, another day may be treated as the holiday. The current list of holidays can be found on the Tech Elevator Intranet.

- New Year's Day
- Birthday of Martin Luther King, Jr.
- Washington's Birthday
- Memorial Day
- Juneteenth National Independence Day
- Independence Day
- Labor Day
- Columbus Day | Indigenous Peoples' Day
- Veterans Day
- Thanksgiving Day
- Christmas Day

In 2023, Tech Elevator employees are eligible for three floating holidays. Floating Holidays must be used in accordance with Stride's Floating Holiday policy – noted earlier in this handbook.

ADDENDA FOUR: MEDCERTS HOLIDAY SCHEDULE

MedCerts employees receive eight fixed holidays each year, and four floating holidays. The fixed holidays for 2022 are:

- New Years Day, observed December 31, 2021
- Martin Luther King, Jr. Day, observed January 17, 2022
- President's Day, observed February 21, 2022
- Memorial Day, observed May 30, 2022
- Independence Day, observed July 4, 2022
- Labor Day, observed September 5, 2022
- Thanksgiving Day, observed November 24, 2022
- Day after Thanksgiving, observed November 25, 2022
- Christmas Day, observed December 25, 2022

During 2022, MedCerts observes six floating holidays:

- Four floating holidays can be used anytime during the year.
- One floating holiday to be used between January 1 and June 30, 2022
- One floating holiday to be used between July 1 and December 31, 2022

Floating Holidays must be used in accordance with Stride's Floating Holiday policy – noted earlier in this handbook.

In 2023, MedCerts anticipates it will follow Stride's holiday schedule.

ADDENDA FIVE: GALVANIZE EMPLOYEES – PTO, HOLIDAY, AND TUITION ASSISTANCE BENEFITS

Galvanize employees are subject to all the policies outlined in this handbook effective January 1, 2021 except:

- The Paid Time Off policies
- The Holiday policy
- The Tuition Assistance Benefits (TAB) policy

Galvanize employees must contact people@galvanize.com for more information about applicable PTO, Holiday, and TAB benefits and policies.

Galvanize Employee Flexible Time-Off Guidelines for Full-Time, Salaried Employees

The time-off policy at Galvanize is simple: for full-time, salaried employees, we recognize that everyone has unique needs for time off and that in our results-focused culture, it's what you produce, not how much time you take off that matters. We are empowering you with the flexibility and responsibility to coordinate your time off with your manager's approval.

Flexible Time-Off ("FTO") means that there is no waiting period to qualify for paid time-off. Employees will not accrue nor run out of FTO days. Employees will not be permitted to take more than 3 consecutive weeks (15 business days) of FTO. FTO does not accrue over time, making it not a compensable item and is not paid out upon separation.

Galvanize Paid Time-Off Guidelines for Regular Full-Time, Hourly Employees

All regular full-time, hourly employees will start to accrue and be able to use accrued Paid Time-Off ("PTO") from the date of hire. The benefit year is from January 1st to December 31st of the same year. The accruals are "deposited" to your Time-Off "bank" each pay period. Employees will not earn PTO while on any type of leave or during company holidays. You can access your current Time-Off balance information through the HRIS.

The table below reflects PTO accrual for a full-time hourly employee based on a 40-hour work week:

Tenure	Total Annual PTO Accrual	Accrual Rate	Maximum PTO Accrual Cap
Under 2 Years	10 days (80 hours)	3.08 hours/ pay period	120 hours
2 Years+	15 days (120 hours)	4.62hours/ pay period	180 hours

Galvanize, Inc. offers 10 days of annual PTO for full-time, hourly employees leading up to their 2-year anniversary. At 2 years and beyond, the accrual will increase to 15 days of annual PTO. PTO shall be accrued on a semi-monthly basis. PTO is credited as 3.08 hours (under 2 years) or 4.62 hours (2 years+) per semi-monthly pay cycle and available to use as soon as it appears in your Time-Off accrual balance in the HRIS.

If the total amount of unused PTO reaches the maximum PTO accrual "cap," additional PTO accrual will stop. When the employee uses PTO time and brings the accrual balance below the "cap," PTO accrual will begin again.

Pay for PTO hours will be paid on the regular pay cycle and on regular hours worked. No overtime hours are included in PTO accrual. PTO days are not considered hours worked when calculating overtime hours. Galvanize pays all accrued but unused PTO when a full-time hourly employee leaves Galvanize at the hourly rate of pay in effect upon separation.

Galvanize's Paid Time-Off program applies to any absence from the job not otherwise covered by a specific time-off benefit outlined in this handbook (e.g. holiday pay, sick time, jury duty, bereavement leave, etc.).

PTO usage and scheduling time off is subject to the discretion and approval of your supervisor.

Galvanize Employee Holidays

Galvanize full-time employees will receive twelve (12) paid holidays, as determined annually by Galvanize. These holidays typically include: New Year's Day; Martin Luther King, Jr. Day; Presidents' Day; Memorial Day;

Independence Day; Labor Day; Thanksgiving Day; the day after Thanksgiving; and Christmas Day. Galvanize employees must always refer to Galvanize's published holiday schedule, which lists each year's observed holidays. Galvanize's holiday schedule is updated on an annual basis and can be found on Galvanize's Human Resource Information System (HRIS.)

Galvanize Tuition Assistance Benefit (TAB) or Tuition Discount Program

Galvanize employees are eligible for Stride, Inc. Tuition Assistance Benefits. This handbook's section on Tuition Assistance Benefits outlines Stride's program, though more information is available on Stride's Intranet – Human Resources tab. Please refer to people@galvanize.com for information about Galvanize's professional development reimbursement options.

Galvanize Employee Referral Program

Galvanize employees are eligible for Stride, Inc. referral bonuses. This handbook's section on Employee Referrals highlights some benefits available in Stride's program. See more information located on the Stride Intranet – Human Resources tab.



HANDBOOK ACKNOWLEDGMENT

I acknowledge that I have received the Stride Employee Handbook ("the Handbook") and understand that violations of the policies contained in the Handbook, including the anti-harassment and discrimination policy, could result in disciplinary action, up to and including termination.

I further understand that the information contained in the Handbook represents guidelines for Stride and that Stride reserves the right to modify the Handbook or amend or terminate any policy, procedure, or employee benefit program at any time, with or without notice.

I further understand that the contents of the Handbook do not form an employment contract. No part of the handbook constitutes an express or implied contract, nor may any part of the handbook be construed as terms or conditions of a contract with Stride.

I understand that my employment is "at-will." Either Stride or I have the right to terminate my employment at any time. I further understand that no manager, supervisor, or representative of Stride, other than the Chief Executive Officer or Senior Vice President of Human Resources, has any authority to enter into any agreement guaranteeing employment for any specific period of time. I also understand that any such agreement, if made, will not be enforceable unless it is in writing and signed by both parties.

I further understand that if I have any questions about the interpretation or application of any policies contained in the Handbook, I should direct these questions to my manager or Human Resources.

Electronically Signed By

Kaitlin Cort

8/25/2022

Employee Signature

Date

Kaitlin Cort

Employee Name Printed