

InsideTrack's Non Discrimination and Unlawful Harassment Policy

InsideTrack is committed to maintaining a work environment in which all individuals are treated with respect. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including unlawful harassment. Therefore, the Company expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice, and harassment.

It is the policy of the InsideTrack to ensure equal opportunity without discrimination or harassment on the basis of race, color, religion, religious creed (including religious dress and grooming practices), national origin, ancestry, citizenship, physical or mental disability, medical condition (including cancer and genetic characteristics), genetic information, marital status, sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), gender, gender identity, gender expression, age (40 years and over), sexual orientation, veteran and/or military status, protected medical leaves (requesting or approved for leave under the Family and Medical Leave Act, the California Family Rights Act, the Oregon Family Leave Act or similar state leave), domestic violence victim status, political affiliation, and any other status protected by federal, state or local law. It is InsideTrack's intent and desire that equal employment opportunity will be provided in all activities related to recruiting, hiring, transfers, promotions, job assignments, disciplinary action, compensation, benefits, training, company-sponsored social and recreational programs, termination and all other privileges, terms, and conditions of employment. In order to provide equal employment and advancement opportunities to all individuals, employment decisions at InsideTrack will be based on merit, qualifications, and abilities.

In addition, InsideTrack prohibits retaliation against a person who engages in activities protected under this policy. Reporting, or assisting in reporting, suspected violations of this policy and cooperating in investigations or proceedings arising out of a violation of this policy are protected activities under this policy.

InsideTrack does not tolerate discrimination, and every employee is expected to avoid bias or prejudice in the workplace. InsideTrack expects all employees to support its endeavors to maintain a workplace free of discrimination. Any employee or job applicant who feels that they have been subjected to discrimination by employees, officers, or agents of InsideTrack should report the incident to InsideTrack's Human Resources Department at 503-821-7086, or the Ethics and Compliance Hotline at 800-272-6015 or at <https://www.stradaeducation.ethicspoint.com>. All complaints will be handled and investigated pursuant to InsideTrack's policy.