SEXUAL HARASSMENT POLICY

SEXUAL HARASSMENT

It is Shorelight’s (The Company) policy to prohibit harassment of any team member by any supervisor, team member, customer, or vendor on the basis of sex or gender.

While it is not easy to define precisely what types of conduct could constitute sexual harassment, examples of prohibited behavior include all of the actions described below under “Other Harassment,” as well as other unwelcome sexual advances, requests for sexual favors, obscene gestures, displaying sexually graphic magazines, calendars or posters, sending sexually explicit emails, text messages and other verbal or physical conduct of a sexual nature, such as uninvited touching of a sexual nature or sexually related comments. Depending upon the circumstances, improper conduct also can include sexual joking, vulgar or offensive conversation or jokes, commenting about a team member's physical appearance, conversation about your own or someone else's sex life, or teasing or other conduct directed toward a person because of his or her gender which is sufficiently severe or pervasive to create an unprofessional and hostile working environment. All such conduct is unacceptable in the workplace and in any work-related settings such as business trips and business-related social functions, regardless of whether the conduct is engaged in by a supervisor, co-worker, client, customer, vendor, or other third party.

OTHER HARASSMENT

Harassment as defined in this policy is unwelcome verbal, visual, or physical conduct creating an intimidating, offensive, or hostile work environment that interferes with work performance. Harassment can be verbal (including slurs, jokes, insults, epithets, gestures or teasing), graphic (including offensive posters, symbols, cartoons, drawings, computer displays, or emails) or physical conduct (including physically threatening another, blocking someone's way, etc.) that denigrates or shows hostility or aversion towards an individual because of any protected characteristic.

REPORTING PROCEDURES

The following steps have been put into place to ensure the work environment at the Company is respectful, professional, and free of discrimination, retaliation, and harassment, including sexual harassment. If you feel that you have been subjected to conduct which violates this policy, you should immediately report the matter to your manager/supervisor. If you are unable for any reason to contact this person, or if you have not received a satisfactory response within five (5) business days after reporting any incident of what you perceive to be in violation of this policy, please contact your second level supervisor.

Note: If your supervisor or next level manager is the person toward whom the complaint is directed you should contact any higher level manager in your reporting chain.

Team members may also contact the Shorelight HR Department at humanresourceshq@shorelight.com or the ADP TotalSource Team member Service Center at 800-554-1802 if they are uncomfortable for any reason using the above procedure.

Every supervisor who learns of a team member’s concern about conduct in violation of this policy, whether in a formal complaint or informally, must immediately report the issues raised to his or her manager or if the manager is the person toward whom the complaint is directed, the supervisor should contact any higher level manager in his or her reporting chain.

INVESTIGATION PROCEDURES, CORRECTIVE ACTION, AND PROHIBITION AGAINST RETALIATION

Upon receiving a complaint, the Company will conduct a prompt, fair, and thorough investigation into any claim of a violation of this policy. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. The Company has a compelling interest in protecting integrity of its investigations. The Company may decide in some circumstances that in order to achieve these objectives, we must maintain the investigation in strict confidence.

As part of the investigation, the Company generally will:

• Interview the complainant, the accused, and other necessary witnesses, and provide each with the opportunity to provide input;
• Document the Company's findings regarding the complaint;
• Document recommended follow-up actions and remedies, if warranted;
• Inform the complainant of the Company's findings.

All team members must cooperate with all investigations conducted pursuant to this policy.
The Company shall determine whether this policy has been violated based upon its reasonable evaluation of the information and credibility of witnesses gathered during its investigation. Upon completion of the investigation, the Company will take corrective measures against any person who has engaged in conduct in violation of this policy, if the Company determines such measures are necessary. These measures may include, but are not limited to, counseling, suspension, or immediate termination. Anyone, regardless of title or position, whom the Company determines has engaged in conduct in violation of this policy, will be subject to disciplinary action, up to and including discharge.

In addition, no team member will be subject to, and the Company will not allow, any form of retaliation against individuals who, in good faith, report unwelcome conduct, pursue any such claim, or cooperate in any way in the investigations of such reports in accordance with this policy.

If a team member believes someone has violated this no-retaliation policy, the team member should bring the matter to the immediate attention of his or her supervisor. If a team member is unable for any reason to contact this person, or if the team member has not received a satisfactory response within five (5) business days after reporting any incident of what the team member perceives to be in violation of this policy, the team member should contact his or her second level supervisor. If the team member's supervisor or next level manager is the person toward whom the complaint is directed the team member should contact any higher level manager in the team member's reporting chain.

Team members may also contact the Shorelight HR Department at humanresourceshq@shorelight.com or the ADP TotalSource Team member Service Center at 800-554-1802 if they are uncomfortable for any reason using the above procedure.

Anyone, regardless of position or title, whom the Company determines has engaged in conduct that violates this policy against retaliation will be subject to discipline, up to and including termination.

We cannot remedy claimed violations of this policy unless team members bring these claims to the attention of management. Failure to report claims of harassment, discrimination and/or retaliation prevents us from taking steps to remedy the problem.

Team members who make complaints in bad faith may be subject to disciplinary action, up to and including termination.

**MASSACHUSETTS TEAM MEMBERS ONLY**

While team members are encouraged to report claims internally, if a team member believes that he or she has been subjected to sexual harassment, he or she may file a formal complaint with the government agency or agencies set forth below. Using the Company's complaint process does not prohibit a team member from filing a complaint with these agencies.

**The United States Equal Employment Opportunity Commission (“EEOC”)**

<table>
<thead>
<tr>
<th>JFK Federal Building, Room 475</th>
<th>One Ashburton Place, Room 601</th>
</tr>
</thead>
<tbody>
<tr>
<td>Boston, Massachusetts 02203</td>
<td>Boston, Massachusetts 02108</td>
</tr>
<tr>
<td>(617) 565-3200</td>
<td>(617) 727-3990</td>
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</tbody>
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**The Massachusetts Commission Against Discrimination (“MCAD”)**

<table>
<thead>
<tr>
<th>Boston Office:</th>
<th>Springfield Office:</th>
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</thead>
<tbody>
<tr>
<td>One Ashburton Place, Room 601</td>
<td>436 Dwight Street, Room 220</td>
</tr>
<tr>
<td>Boston, Massachusetts 02108</td>
<td>Springfield, Massachusetts 01103</td>
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**NON MASSACHUSETTS TEAM MEMBERS**

Alternatively, you can also file a complaint through the central office below.

**Washington Field Office**

131 M Street, NE
Fourth Floor, Suite 4NWO2F
Washington, DC 20507-0100
1-(800)-669-4000

I have read and I understand Shorelight Education’s Sexual Harassment Policy.

Team member's Printed Name: ___________________________ Position: ___________________________

Team member’s Signature: ___________________________ Date: ___________________________

The signed original copy of this receipt should be given to management - it will be filed in your personnel file.