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Summary:

Strategic Education, Inc.'s (Strategic Education) Occupational Safety and Health (OSH) policy demonstrates to all employees that there is a commitment to ensuring a high standard of health and safety in the workplace. The standards within this policy are clearly stated and communicated to Strategic Education employees. At Strategic Education, it is essential to clearly outline the standards of health and safety for all employees. Strategic Education provides information to employees about workplace safety and health issues through regular internal communication channels, such as supervisor-employee meetings, intranet postings and bulletin boards, memos, e-mail, or other written communications.

All employees, contractors, and vendors who work for or with Strategic Education are expected to adhere to the safety and security policies and procedures established in this policy at all Strategic Education locations. This includes campuses and corporate offices.

Facility Safety:

Strategic Education strives to provide a safe workplace for its employees consistent with the requirements of the Occupational Safety and Health Act of 1970 ("OSHA"), state-specific OSH requirements, and other applicable regulations. Safety and employee well-being must be part of our everyday operations. Without question, it is the responsibility of every employee at all levels to be safety-conscious, obey safety rules, and exercise caution in all work activities. To comply with the applicable laws, we must be aware of conditions in all work areas that could potentially produce injuries. Each employee's cooperation in detecting, reporting, and controlling hazards is a condition of employment. Unsafe equipment or conditions, as well as any on-the-job injuries, must be reported to your supervisor immediately. Creating, failing to report, or (where appropriate) failing to remedy a hazardous or dangerous situation may result in discipline up to and including discharge.

All accidents (which include any event that is not expected, foreseen, or intended), when known must be promptly reported to your supervisor or Human Resources. The accident must be reported whether there is personal or physical damage involved. A near-miss, where the potential for injury or damage exists, is to be promptly reported as well. Accidents and near-misses are investigated to eliminate unsafe conditions and unsafe acts. If your supervisor is not available, report the accident or near-miss to the Human Resources Department (information at end of policy). Such reports are necessary so that Strategic Education can comply with applicable laws and initiate insurance or worker's compensation benefits procedures. Consequently, failing to report accidents and near-misses may result in discipline up to and including discharge.

Drug-and-Alcohol Free Workplace:

Strategic Education is committed to a safe and drug-free workplace. Strategic Education prohibits the unlawful possession, use, or distribution of alcohol and/or illicit drugs by employees on all its premises and while conducting business-related activities off the premises. The legal use of prescribed drugs is permitted on the job only if it does not impair an employee's ability to perform the essential functions of the job effectively and in a manner that does not endanger other individuals in the workplace. The consumption of alcohol at a Strategic

Education location will only be permitted in very limited circumstances and will require advanced, formal approval from both HR and Legal. While attending these types of events, employees should use their best judgment, act responsibly and appropriately, and keep alcohol intake to a modest and legal level.

In accordance with applicable law, each employee is hereby notified that the unlawful manufacture, sale, distribution, dispensation, transfer, possession, or use of a controlled substance is prohibited in any Strategic Education workplace, at any activity of the company or its subsidiaries, or while performing any aspects of the job. "Controlled substances" encompass both illegal drugs as well as the unauthorized use of prescription drugs and the inappropriate use of alcohol. "Workplace" means any Company property or any location where employees engage in Company business or perform tasks on behalf of the Company. Strategic Education reserves the right to require job applicants to take and pass a mandatory drug and alcohol test following their acceptance of a conditional offer of employment, before the actual time they commence employment, and as required by law. Based on the circumstance, Strategic Education also may require testing as a condition of continued employment.

As an extension of Strategic Education's commitment to a drug and alcohol-free workplace, these provisions also apply to any employee whose work performance is affected by the use of a controlled substance, without regard to where such use occurred.

Strategic Education complies with the requirements of the Drug Free Workplace Act of 1988. Under this act, employees must notify Human Resources of any criminal drug statute conviction for a violation in the workplace not later than five days after the conviction. Strategic Education is required to notify the Department of Education within ten days of an employee's conviction and must take action against an employee within 30 days of a violation of the policy.

Strategic Education strongly encourages employees with drug or alcohol concerns to utilize the Employee Assistance Program. This confidential service is available to employees and their family members to provide assistance, resources, and information about drug and alcohol abuse plus a wide variety of other personal, family, financial, and legal counseling services. Additionally, covered employees may be eligible for various services related to drug and alcohol abuse through their health insurance plan.

Smoke-Free Workplace:

Strategic Education supports the maintenance of a smoke-free and tobacco-free environment. The use of tobacco or smoking products, including but not limited to pipes, cigars, chewing tobacco, cigarettes, or vaping with e-cigarettes in any Strategic Education area, (including private offices, restrooms, and the employee lunchroom) is strictly prohibited. Smoking is permitted only in designated areas outside of Strategic Education buildings.

Maintaining a Safe Working Environment:

It is the responsibility of all Strategic Education employees to maintain a safe and neat working environment by keeping workstations, aisles, and other workspaces free from obstacles, wires, and other potential hazards.

Firearms or other weapons Policy:

Firearms or other weapons are not permitted on Strategic Education property, parking lots, alternate work locations maintained by Strategic Education, or at Strategic Education sponsored events unless the application of such policy would be prohibited by law, or an authorized exception has been granted. Authorized exceptions for possession and/or use of a weapon include:

- Use by a certified law enforcement officer licensed to carry a weapon and in compliance with state and federal law.
- Use by an employee or contractor as a requirement of their job duties and in compliance with state and federal law.
- For unique or personal circumstances where approved by Human Resources in writing.

Incidents or concerns as addressed in this policy should be reported to your supervisor or reported via email to humanresources@strategiced.com.