



3rd Millennium Classrooms Reporting and Escalation Policy

1. Purpose

We are committed to maintaining ethical standards and conduct. This Reporting and Escalation Policy directs all employees, permanent or temporary, and all vendors with their reporting requirements under the various 3rd Millennium Classrooms policies and ensures proper evaluation and escalation of identified incidents or violations.

2. Scope

The users of this document are all customers, clients, employees, permanent or temporary and all vendors (collectively, “Associates”) related to 3rd Millennium Classrooms.

This Reporting and Escalation Policy includes instructions on how to report unethical behavior, report a failure, concern, incident or complaint.

3. Initial Reporting

Associates should report any issues they believe to be a potential or actual breach of any 3rd Millennium Classrooms policies to company management. Initial reports should be directed to:

Email: help@3rdmil.com

Phone: 1 (888) 810-7990

Initial reports may also be made anonymously using the following hotline: 1-877-729-3231

4. Acknowledgments

An Associate will receive an acknowledgment of escalated reports from the 3rd Millennium Classrooms Escalation Officer within 72 hours of a report, via email or other written correspondence.

Due to the private nature of anonymous reports, anonymous reports will not receive acknowledgments.

5. Escalation

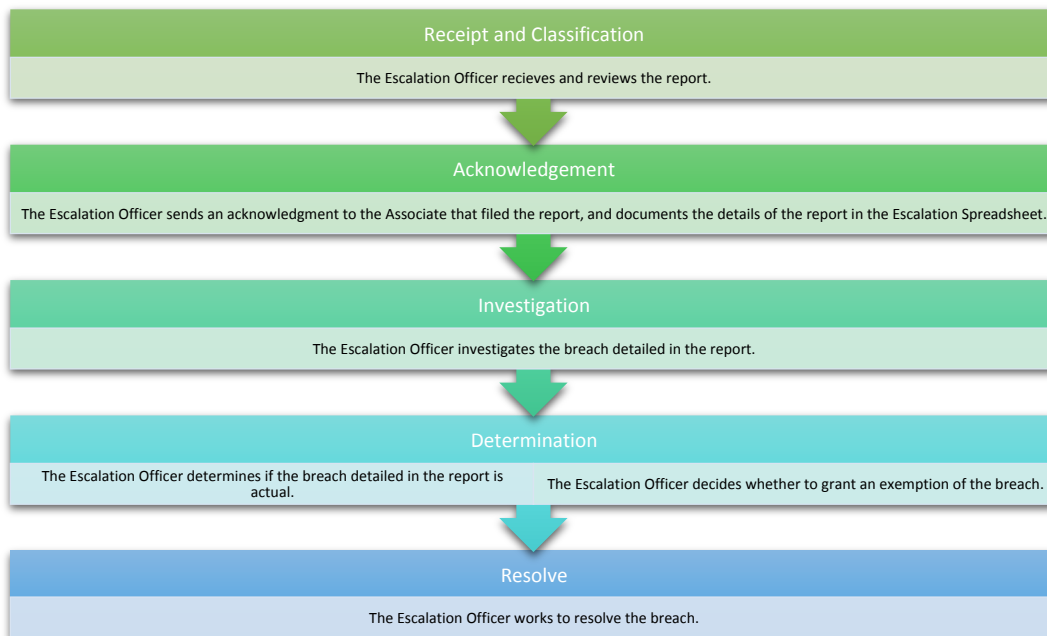
If an issue is not resolved following an initial report, or if the report is of a critical and sensitive nature, associates should immediately report the issues they believe are a potential or actual breach of any 3rd Millennium Classrooms policies to the Escalation Officer identified in this Policy. All reports must be dated and in writing, either on paper or electronically in order to be eligible for escalation. Oral reports are not sufficient for escalation.

Escalated reports will be referred to the Escalation Officer detailed below.

6. Escalation Procedures

The Escalation Officer or designee must review the matter and determine whether the issue is an actual breach and whether to grant an exception, and/or the appropriate course of action.

The Escalation Officer must document all reported potential or actual breaches in the Escalation Spreadsheet, which is to be retained for no less than three years.



When making such determination, the Escalation Officer may, as part of their review, discuss the matter with relevant business unit management, members of the Senior Management Team, governance committees and/or other parties (i.e. legal counsel, auditor, etc.).

The Escalation Officer may grant exceptions to any provision of this Reporting and Escalation Policy so long as such exceptions are consistent with the purpose of the Reporting and Escalation Policy and applicable law. Any questions regarding the applicability of this Reporting and Escalation Policy should be directed to the identified Escalation Officer.

7. Whistleblowers

Associates may exercise their rights to directly contact any regulatory authority, government agency or entity, to report possible violations of law or make other disclosures under applicable whistleblower laws. Nothing in this policy is intended or should not be construed to restrict, discourage or interfere with communications or actions protected or required by state or federal laws or regulations. Associates do not need prior authorization of 3rd Millennium Classrooms or their management to make any such reports or disclosures and will not be retaliated against for making such reports or disclosures.

8. Key Roles and Responsibilities

The Escalation Officer is responsible for handling all Reporting and Escalation Policy matters.

For external or internal incidents or violations that are not contemplated by existing policy, procedure or guidance, the Escalation Officer has been charged with the responsibility of addressing these other issues.

Upon an issue being reported, the Escalation Officer will perform a brief assessment to determine the appropriate channel and resources for further evaluation, management and remediation. Once that determination has been made, the Escalation Officer will coordinate remediation of the issue, with all relevant information, to the appropriate parties.

Issues escalated according to this Policy will be treated as sensitive and will be discussed on a need-to-know basis with business unit management and Legal and/or Human Resources Departments, as appropriate.

At the time of this publication, the Escalation Officer information is as follows:

Escalation Officer Katie McCall

Email: kmccall@3rdmil.com

Physical Address: 15900 La Cantera Parkway #20265, San Antonio, TX 78256

9. Managing Records

This document is valid as of the date listed below.

The owner of this document is the Escalation Officer, who is responsible for updating this document once per year and notifying staff of any relevant changes.

Revision History		
1	Document Creation	September 17, 2019
2	Addition of Anonymous Hotline	October 2, 2019