

Walden University



2023-2024 Annual Disclosure
Student Right-to-Know and Campus Security (Clery Act)
Annual Security Report
Sex and Gender Based Misconduct Response and Prevention Policy
Alcohol & Substance Abuse Policy
Student Rights under FERPA
(The Family Educational Rights and Privacy Act)

This document includes information for:

Online

September 22, 2023

TABLE OF CONTENTS

CAMPUS WATCH.....	3
REPORTING CRIMES AND EMERGENCIES	3
ANNUAL SECURITY REPORT.....	3
CAMPUS ACCESS, FACILITY SECURITY AND LAW ENFORCEMENT.....	4
SAFETY AND SECURITY.....	4
SEXUAL VIOLENCE POLICY.....	5
STATE SEXUAL OFFENDER REGISTRY LIST.....	11
DRUG AND ALCOHOL POLICY.....	<u>15</u>
LAWS REGARDING ALCOHOL AND DRUGS.....	<u>16</u>
SCHOOL SANCTIONS **	<u>16</u>
LOCAL TREATMENT RESOURCES.....	<u>18</u>
STUDENT CODE OF CONDUCT	<u>18</u>
STUDENT COMPLAINT/GRIEVANCE PROCEDURE	<u>21</u>
STUDENT RIGHTS UNDER FERPA.....	<u>25</u>
DIRECTORY INFORMATION	<u>26</u>
VOTER REGISTRATION.....	<u>26</u>
UNAUTHORIZED DISTRIBUTION OF COPYRIGHTED MATERIALS.....	<u>26</u>
COLLEAGUE CODE OF CONDUCT.....	28

CAMPUS WATCH

It's your campus - Protect it!

A truly safe campus can only be achieved through the cooperation of students, faculty and staff. As a member of the Walden University community, it is your responsibility to report a crime, suspicious activity or other emergencies on campus to the appropriate school official. Should you become a witness to or victim of a crime, immediately report the incident to local law enforcement officials, the Student Services office, or to the Incident Commander. All crimes will be investigated and when appropriate, brought to the attention of the Student Services office for disciplinary hearings.

Purpose of the Annual Disclosure Report Walden University prepares this report to comply with the *Jeanne Clery Disclosure of Campus Security and Crime Statistics Act*. The full text of this document can also be found on the <https://www.waldenu.edu/legal/student-safety-title-ix> r by visiting your local Student Services Office. This report was prepared with the assistance of local law enforcement agencies. Campus crime, arrest and referral statistics include those that were reported to local law enforcement and campus faculty and staff. This data may also include crimes that have occurred in private residences or businesses adjacent to the campus.

REPORTING CRIMES AND EMERGENCIES

When making your report of an incident you will be asked to provide the following information:

1. Description of the incident
2. Date, time and location of the incident
3. Description of the persons or vehicles involved in the incident
4. Detail regarding who was notified about the incident

Upon receipt of this report Walden University will determine the appropriate response, which could include disciplinary action against the offender(s), notification to local law enforcement, notification to the campus community or other public safety alternatives deemed appropriate given the circumstances. Please note that your identity may not be confidential when reporting an incident. Walden University does not have procedures for voluntary, confidential reporting of crimes.

At the beginning of each residency,, Walden University will contact the local police departments and property management to monitor and record crimes that occur within the designated area surrounding the campus that have been reported to the local Police.

All Emergencies –Dial 911

ANNUAL SECURITY REPORT

Walden University will, without delay, and taking into account the safety of the community, determine the content of the notification. The warning will be issued by e-mail and phone through the Walden University Residency timely warning system to students, faculty, and staff who are attending that particular Residency. Unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

Incident Commander will determine if there is a significant emergency or dangerous situation and what segment of the campus community will need to receive a notification.

Residencies occur at non-campus buildings and property not under the ownership of Walden, but certain specified areas are controlled by the University during short-term offsite Residencies. Therefore, in the event of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students, staff or faculty which occurs at a Residency, the Residency location personnel, or staff (for example, hotel staff or local

authorities) are responsible for communication of emergency procedures and the determination of an emergency situation.

Area Police/Fire Non-Emergency Numbers:

County/City
Not Applicable

Police
Not Applicable

Fire/Paramedic
Not Applicable

CAMPUS ACCESS, FACILITY SECURITY AND LAW ENFORCEMENT

Online: No Physical Student Campus; Not Applicable

SAFETY AND SECURITY

Walden University does not have a campus police or security department. To help ensure the safety of Walden students, faculty and staff attending Walden Residencies (“residency attendees”), the university fully cooperates with local police and other public law enforcement. Walden has designated a Residency Security Authority (RSA) at every Residency. The RSA will be on-site at the Residency and available to receive reports of crimes affecting Residency attendees. Individuals should report any complaints regarding any criminal activity, non-compliance with the Clery Act or VAWA, or any state-specific issues to the RSA. The RSA is the Walden Director of Residencies, or his or her designee.

Safety and Security Tips

Personal

- Stay alert and tuned in to your surroundings.
- Communicate that you are calm, confident and know where you are going.
- Stay away from isolated areas.
- Stay on the part of sidewalks furthest away from shrubs, dark doorways and alleys.
- Walk with a companion whenever possible.
- Check the back seat before getting into a car. Keep doors locked while driving.
- Don’t overload yourself with packages or wear shoes or clothing that restricts movement.
- Avoid displaying large amounts of cash or jewelry.
- Carry a purse close to your body. Carry a wallet in an inside coat or front trouser pocket.
- If you think someone is following you, abruptly switch directions and walk toward an open store, restaurant or lighted home.
- Don’t hitchhike or pick up hitchhikers.
- Park in well-lighted areas.
- Avoid isolated bus stops at times when few other people are around.
- Do not reveal your name, phone number or address to strangers.
- Never admit that you are alone or that you will be away from home.
- Keep an eye on neighbors’ homes or apartments while they are away and have them do the same for you.
- Keep your local police department’s phone number next to your phone.

Residence

- Keep doors locked at all times
- Draw shades and curtains whether or not you are at home
- Keep money and jewelry locked in a safe place
- Leave a light on while you are away or use a timer
- Secure sliding glass doors with commercially available locks or a rigid wooden dowel in the track
- Don’t hide spare keys in mailboxes, planters or under doormats
- Make a record of your valuables and keep it in a safe spot
- Don’t leave a note that says you are not in
- Never prop doors open
- Keep ladders and tools in a locked area
- Have someone cut your lawn while you’re on vacation

Vehicle

- Always lock your car and remove the keys. Make sure the windows are closed.
- Lock all valuables in the trunk
- Never leave an ID tag on your key ring
- Leave only the ignition key with parking attendants
- Park in well-lit areas

Office

- Keep your purse, wallet and other valuable items with you at all times or locked in a drawer or closet
- Never leave keys lying out
- Never leave change or cash on the desk or in a top drawer
- Notify security personnel of any suspicious persons or vehicles
- Lock doors when working after normal hours
- Report any broken or flickering lights, and doors that don't lock properly

SEXUAL VIOLENCE POLICY

3.1 Education

Walden University educates all Residency attendees about sexual assaults (including all forms of rape), dating violence, domestic violence and stalking through ongoing prevention and awareness programs, such as a mandatory online training course provided prior to attendance. As part of the Walden University Residency materials, students, faculty, and Residency staff are provided with information regarding security procedures, practices, and crime prevention during Walden University residencies, as well as with information regarding primary and ongoing prevention and awareness programs to prevent dating violence, domestic violence, sexual assault, and stalking during Walden University residencies. The materials include:

- a statement that Walden University prohibits domestic violence, dating violence, sexual assault, and stalking;
- the definition of domestic violence, dating violence, sexual assault, and stalking in the applicable jurisdiction;
- the definition of consent, in reference to sexual activity, in the applicable jurisdiction;
- safe and positive options for bystander intervention that may be carried out by an individual to prevent harm or intervene when there is a risk of domestic violence, dating violence, sexual assault, or stalking against a person other than such individual;
- information on risk reduction to recognize warning signs of abusive behavior and how to avoid potential attacks.
- bystander empowerment training that highlights the need for those who intervene to ensure their own safety in the intervention techniques they choose, and motivates them to intervene as stakeholders in the safety of the community when others might choose to be bystanders. Bystander engagement is encouraged through safe and positive intervention techniques and by empowering third-party intervention and prevention such as calling for help, using intervention-based apps, identifying allies, and/or creating distractions.
- A statement that the university will provide written notification to students and employees about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available for victims, both within the institution and in the community.
- A statement that the university will provide written notification to victims about options for, available assistance in, and how to request changes to academic situations, living situations, working situations, and protective measures.

3.2 Definitions

Walden University's *Code of Conduct* prohibits sexually violent acts, which can be considered criminal offenses as well. Sexual misconduct includes non-consensual sexual intercourse, non-consensual sexual contact, sexual exploitation, interpersonal relationship violence, sex/gender-based stalking and sexual harassment. While Walden may utilize different standards and definitions than state criminal codes, sexual misconduct often overlaps with

crimes of rape, sexual assault, sexual harassment, stalking, dating violence and domestic violence. Section 3.3 outlines the procedures for reporting sexual misconduct.

Sexual harassment is also a form of misconduct that undermines the integrity of the academic environment. It is the policy of Walden University that sexual harassment is prohibited. All members of the Walden community, especially officers, faculty and other individuals who exercise supervisory authority, have an obligation to promote an environment that is free of sexual harassment.

Sexual harassment, as defined in the Walden University *Code of Conduct* can include, but is not limited to, unwelcome sexual advances; requests for sexual favors; unwelcome physical contact of a sexual nature; e-mails containing inappropriate sexual content; obscene or harassing phone calls or jokes of a sexual nature; suggestive gestures, sounds, stares, or other verbal or physical conduct of a sexual nature when:

- a. Submission to such conduct is made, either explicitly or implicitly, a term or condition of a student's academic progress;
- b. Submission to or rejection of such conduct by an individual is used as a basis for decisions affecting assessment of academic progress; or
- c. Such conduct, by instructors, staff, or students, including between students, has the purpose or effect of interfering with academic performance or creating an intimidating, hostile, or offensive environment.

Reporting of statistics under the Clery Act uses federal offenses definitions that allow comparability across Residencies, regardless of the state in which the Residency is located. These definitions are as follows:

Sexual Assault (Sex Offense): Any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent.

A. *Fondling* — The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.

B. *Incest* — Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

C. *Statutory Rape* – Sexual intercourse with a person who is under the statutory age of consent.

D. *Rape* – Rape is generally defined by states as forced sexual intercourse. It may also include situations where the victim is incapable of giving consent due to incapacitation by means of disability or alcohol or other drugs. Many rapes are committed by someone the victim knows, such as a date or friend. The FBI's updated definition of rape, which encompasses the categories of rape, sodomy, and sexual assault with an object is: Penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.

Dating Violence: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim.

- The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. o For the purposes of this definition: ☐ Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.

- ☐ Dating violence does not include acts covered under the definition of domestic violence.

o For the purposes of complying with the requirements of this section and §668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Domestic Violence: A felony or misdemeanor crime of violence committed:

- By a current or former spouse or intimate partner of the victim;
- By a person with whom the victim shares a child in common;

- By a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner;
- By a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or
- By any other person against an adult or youth victim who is protected

Stalking: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- Fear for the person's safety or the safety of others; or
- Suffer substantial emotional distress.
- For the purposes of this definition, course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property.

Bystander Intervention: Safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is a risk of dating violence, domestic violence, sexual assault, or stalking. Bystander intervention includes:

- recognizing situations of potential harm;
- understanding institutional structures and cultural conditions that facilitate violence (this might include fraternity or sports cultures at some institutions);
- overcoming barriers to intervening;
- identifying safe and effective intervention options; and taking action to intervene.

Consent: A freely given agreement to the sexual conduct in question. Lack of verbal or physical resistance or submission by the claimant resulting from the use of force or threat of force by the respondent shall not constitute consent. Consent may be withdrawn at any time.

3.3 Reporting Procedures for Sexual Misconduct including Domestic Violence, Dating Violence, Sexual Assault and Stalking.

In the event that sexual misconduct, gender-based violence or the crimes of sexual assault, stalking, dating violence or domestic violence does occur, Walden University takes the matter very seriously. Any complaints or inquiries regarding sexual misconduct or harassment should be brought forth to the Title IX Coordinator, Deputy Title IX Coordinator, or the RSA. All such claims will be investigated promptly and thoroughly.

It is the policy of Walden University to promote awareness to prevent dating violence, domestic violence, sexual assault, and stalking, and other forcible and non-forcible sex offenses, and to encourage anyone who is the victim or witness to any such offense to promptly report the incident to the local police and, if applicable, to the security personnel at the Residency location. If you are the victim of sexual misconduct, gender-based violence, or the crimes of rape, acquaintance rape, sexual assault, sexual harassment, stalking, dating violence, or domestic violence, some or all of these safety suggestions may guide you after an incident has occurred:

1. Go to a safe place and speak with someone you trust. Tell this person what happened and have them call 911.
2. Students may file a disciplinary complaint by contacting the Title IX Coordinator via phone or email (*contact information located in Section 2*). The Title IX Coordinator is responsible for receiving and processing, in a timely manner, reports from students, faculty, staff, and administrators regarding rights and responsibilities concerning sexual misconduct in violation of Title IX.
3. File a police report with the local police. A report will not obligate the victim to prosecute, nor will it subject the victim to scrutiny or judgmental opinions from officers. Filing a police report will: ☐ ensure that a victim of sexual assault receives the necessary medical treatment and tests, at no expense to the victim;
☐ provide the opportunity for collection of evidence helpful in prosecution, which cannot be obtained later;
☐ assure the victim has access to free confidential counseling from counselors specifically trained in the area of sexual assault crisis intervention.
4. Consider securing immediate professional support (e.g., counseling, victim advocacy, medical services, etc.) to assist you in the crisis.
5. For your safety and well-being, immediate medical attention is encouraged. Further, being examined as soon as possible, ideally within 120 hours, is important in the case of rape or sexual assault. The hospital will arrange for a specific medical examination at no charge or can work with you to arrange state reimbursement.
☐ To preserve evidence, it is recommended that you do not bathe, shower, douche, eat, drink, smoke, brush your teeth, urinate, defecate, or change clothes before receiving medical attention. Even if you have already taken any of these actions, you are still encouraged to have prompt medical care, and evidence may still be recoverable.
☐ Typically, if police are involved or will be involved, they will obtain evidence from the scene, and it is best to leave things undisturbed until their arrival. They will gather bedding, linens or unlaundered clothing, and any other pertinent articles that may be used for evidence. It is best to allow police to secure items in evidence containers, but if you are involved in

transmission of items of evidence, such as to the hospital, secure them in a clean **paper** bag or clean sheet to avoid contamination.

- ☐ If you have physical injuries, photograph or have them photographed, with a date stamp on the photo.
- ☐ Record the names of any witnesses and their contact information. This information may be helpful as proof of a crime, to obtain an order of protection, or to offer proof of a campus policy violation.
- ☐ Try to memorize details (e.g., physical description, names, license plate number, car description, etc.), or even better, write notes to remind you of details, if you have time and the ability to do so.
- ☐ If you obtain external orders of protection (e.g., restraining orders, injunctions, protection from abuse), please notify Residency Staff or the Title IX Coordinator so that those orders can be observed during the Residency.

To report an incident that occurs at a Walden University Residency, individuals should dial 911 and seek immediate medical attention. Anyone with knowledge about sexual misconduct, gender-based violence, or the crimes of rape, sexual assault, sexual harassment, stalking, dating violence, or domestic violence is encouraged to report it immediately. However, a victim has the right to decline to notify such authorities. If requested, Residency staff will assist the student in notifying the local police and security personnel at the location.

Protective measures for victims are available whether a victim chooses to report to local law enforcement, and irrespective of whether a victim pursues a formal complaint through the Walden University resolution process. Walden will use its best efforts to inform crime victims of their rights and support the victim in relation to orders of protection, no contact orders, restraining orders, or similar lawful orders issued by criminal, civil, or tribal courts. Walden University students or employees who report that he or she has been a victim of domestic violence, dating violence, sexual assault, stalking and other forcible and non-forcible sex offenses at a residency shall be provided with a written explanation of his or her rights and options.

Students, faculty, and staff members have the right to file both a criminal complaint and a Title IX complaint simultaneously.

More information regarding Title IX may be found at: <https://www.waldenu.edu/legal/student-safety-title-ix>.

3.4 Confidentiality and Accommodations

If applicable and requested by the student, Residency staff will provide the victim of an offense with options for a change in the student's accommodations or academic situations. Any accommodations or protective measures provided to a victim of sexual misconduct will be kept confidential to the extent that maintaining such confidentiality will not impair the ability of the university to provide the accommodations or protective measures. Walden will complete publicly available record keeping, including Clery Act reporting and disclosures, without the inclusion of personally identifying information about the victim. Contact the Title IX Coordinator if you need assistance with Walden University concerns, such as no-contact orders or other protective measures. The Title IX Coordinator will also assist in any needed advocacy for students who wish to obtain protective or restraining orders from local authorities.

Walden is able to offer reasonable academic supports, changes to living arrangements, transportation resources or modifications, escorts, no contact orders, counseling services access, and other appropriate supports and resources as needed by a victim. Walden University also offers confidential services for victims

Enter ID: SAP4EDU.

of sexual misconduct. Students, faculty, and staff may contact the Walden University Student Assistance Program via phone: **866.465.8942** or online: www.guidanceresources.com Enter ID: SAP4EDU.

3.5 Disciplinary Action

If applicable, disciplinary action will be taken in accordance with the Walden [Code of Conduct](#). Walden University will, upon written request, disclose to the alleged victim of a crime of violence or other non-forcible sex offense, the results of any disciplinary hearing conducted by the university against a student who is the alleged perpetrator of such a crime or offense. If the alleged victim is deceased as a result of the crime or offense, the information will be provided to the victim's immediate family, if so requested. In conducting disciplinary proceedings for cases of sexual misconduct, Walden will use a preponderance of evidence as its evidentiary standard.

Walden's process and procedures for institutional disciplinary action in cases of domestic violence, dating violence, sexual assault, or stalking, will provide a prompt, fair, and impartial investigation, and resolution. It will be conducted by officials who receive annual training on issues related to such offenses, and other forcible and non-forcible sex offenses, and on how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability.

The type of proceeding used will be determined based upon a number of factors, including the circumstances and seriousness of the allegation. The investigation may, but not necessarily, include a hearing. The investigation may include, but is not limited to, conducting interviews of the Complainant, the alleged perpetrator, and any witnesses; reviewing law enforcement investigation documents (if applicable); reviewing student and personnel files; and gathering and examining other relevant documents or evidence.

Upon the completion of the investigation, the Title IX Coordinator shall present the findings to Walden University leadership which may include, as appropriate, the Executive Director of Student Affairs, the Associate Dean, the Chief Academic Officer, or Human Resources Director. Walden University leadership shall then determine the appropriate resolution to the complaint, considering factors including the role of the party within the university community (student, faculty, or employee). Following a final determination of disciplinary action relating to dating violence, domestic violence, sexual assault or stalking, or any other forcible and non-forcible sex offense, Walden may impose sanctions up to and including dismissal from the university. Walden will institute appropriate measures in order to protect the crime victim relating to the investigative and disciplinary proceedings.

All parties to the process are entitled to have a support person/advisor of their choice at any proceeding or related meeting. This support person/advisor is any individual who provides the accuser or accused support, guidance, or advice. Walden will inform the parties to the proceeding simultaneously of: the outcome of any institutional disciplinary proceeding that arises from an allegation of domestic violence, dating violence, sexual assault, or stalking, the procedures for appealing the results of the proceeding, any change to the results that occurs prior to the time that such results become final, and when such results become final. Walden will attempt to have the investigation and disciplinary process completed in a reasonable timeframe, with the goal being to complete the entire process within 60 days.

A student (either Complainant or alleged perpetrator) may appeal the decision of the university in cases of sexual misconduct policy violations. Faculty and other employees should review their applicable employee handbook for further information regarding their rights under this policy. A student found guilty of violating the Walden's sexual misconduct policy could be criminally prosecuted in state courts and may be suspended or dismissed from the university for the first offense. To the extent possible by law, confidentiality of identifying information regarding victims will be protected. Victims of reported dating violence, domestic violence, sexual assault, or stalking will be offered assistance in changing academic or working situations, if requested by the victim and if reasonably available, regardless of whether the victim chooses to report the crime to campus police or local law enforcement.

3.6 Registered Sex Offender Information

In accordance with the Campus Sex Crimes Prevention Act of 2000, which amends the Jacob Wetterling Crimes Against Children and Sexually Violent Offender Registration Act, the Jeanne Clery Act and the Family Educational Rights and Privacy Act of 1974, Walden University is providing a link to the Dru Sjodin National Sex Offender Public Website (“NSOPW”), coordinated by the U.S. Department of Justice, which is a cooperative effort between jurisdictions hosting public sex offender registries (“Jurisdictions”) and the federal government and is offered free of charge to the public. These jurisdictions include the 50 states, U.S. Territories, the District of Columbia, and participating tribes. The website provides an advanced search tool that allows a user to submit a single national query to obtain information about sex offenders; a listing of public registry websites by state, territory, and tribe; and information on sexual abuse education and prevention. The Dru Sjodin National Sex Offender Public Website (“NSOPW”) may be accessed at <http://www.nsopw.gov>. Walden is also supplying a direct link to each state’s website where a Residency was hosted in 2020:

Minnesota: <https://por.state.mn.us/ListOffenders.aspx>

Georgia: http://state.sor.gbi.ga.gov/Sort_Public/OffenderSearchResults.aspx

ALL SEX OFFENDERS ARE REQUIRED TO REGISTER AND TO DELIVER WRITTEN NOTICE OF THEIR STATUS AS A SEX OFFENDER TO THE RESIDENCY COORDINATOR UPON THEIR ATTENDANCE AT, AS STUDENT, FACULTY OR STAFF, A WALDEN UNIVERSITY RESIDENCY.

STATE SEXUAL OFFENDER REGISTRY LIST

ALABAMA

Website:

http://sheriffalerts.com/cap_office_disclaimer.php?office=54247&fwd=aHR0cDovL3d3dy5jb21tdW5pdHlub3RpZmljYXRpb24uY29tL2Nhcf9tYWluLnBocD9vZmZpY2U9NTQyNDc=

Phone Number: 334-676-7250

ALASKA

Website: <https://dps.alaska.gov/SORWeb/>

Phone Number: 907-269-0396 or 800-658-8892 (outside Anchorage in Alaska)

ARIZONA

Website: <https://www.azdps.gov/services/public/offender>

Phone Number: 602-255-0611

ARKANSAS

Website: <https://www.ark.org/offender-search/index.php>

Phone Number: 501-682-2222

CALIFORNIA

Website: <http://www.meganslaw.ca.gov/>

Phone Number: 916-327-5413

COLORADO

Website: <https://apps.colorado.gov/apps/sor/?SOR=home.caveat>

Phone Number: 303-239-4201

CONNECTICUT

Website: http://www.communitynotification.com/cap_office_disclaimer.php?office=54567

Phone Number: 860-685-8060

DELAWARE

Website: <https://sexoffender.dsp.delaware.gov/>

Phone Number: 302-739-5882

DISTRICT OF COLUMBIA

Website: <http://sexoffender.dc.gov/>

Phone Number: 202-727-4407

FLORIDA

Website: <https://offender.fdle.state.fl.us/offender/sops/offenderSearch.jsf>

Phone Number: 888-357-7332

GEORGIA

Website: <https://gbi.georgia.gov/services/georgia-sex-offender-registry> Primary: [\(404\) 270-8465](tel:(404)270-8465)

Phone: [\(404\) 270-8622](tel:(404)270-8622)

Email Link: gcicsexoffenders@gbi.ga.gov

HAWAII

Website: <http://sexoffenders.ehawaii.gov/sexoffender/welcome.html>

Phone Number: 808-587-3350

IDAHO

Website: http://www.isp.idaho.gov/sor_id/

Phone Number: 208-884-7305

ILLINOIS

Website: <https://isp.illinois.gov/Sor>

Phone Number: 217-785-0653

INDIANA

Website: <http://www.icrimewatch.net/indiana.php>

Phone Number: 800-622-4779

IOWA

Website: <http://www.iowasexoffender.com/>

Phone Number: 515-725-6050

KANSAS

Website: [Public Offender Registry \(ks.gov\)](http://PublicOffenderRegistry.ks.gov)

Phone Number: 785-296-2841

KENTUCKY

Website: <http://kspsor.state.ky.us/>

Phone Number: 502-227-8700

LOUISIANA

Website: [Louisiana State Police \(icrimewatch.net\)](http://LouisianaStatePolice.icrimewatch.net)

Phone Number: 800-858-0551

MAINE

Website: <http://sor.informe.org/cgi-bin/sor/index.pl>

Phone Number: 207-624-7270

MARYLAND

Website: <http://www.socem.info/>

Phone Number: 410-585-3600

MASSACHUSETTS

Website: <http://www.mass.gov/eopss/agencies/sorb/>

Phone Number: 978-740-6400

MICHIGAN

Website: http://www.communitynotification.com/cap_main.php?office=55242/

Phone Number: 517-241-1806

MINNESOTA

Website: <https://coms.doc.state.mn.us/PublicViewer/>

Phone Number: 651-361-7200

MISSISSIPPI

Website: <http://state.sor.dps.ms.gov/>

Phone Number: 601-987-1540

MISSOURI

Website: <http://www.mshp.dps.missouri.gov/MSHPWeb/PatrolDivisions/CRID/SOR/SORPage.html>

Phone Number: 888-767-6747

MONTANA

Website: <https://app.doj.mt.gov/apps/svow/>

Phone Number: 406-444-7068

NEBRASKA

Website: <https://sor.nebraska.gov/>

Phone Number: 402-471-8647

NEVADA

Website: <http://www.nvsexoffenders.gov/>

Phone Number: 775-684-6262

NEW HAMPSHIRE

Website: <https://business.nh.gov/NSOR/>

Phone Number: 800-735-2964

NEW JERSEY

Website: <http://www.njsp.org/sex-offender-registry/index.shtml>

Phone Number: 609-882-2000

NEW MEXICO

Website:

http://sheriffalerts.com/cap_office_disclaimer.php?office=55290&fwd=aHR0cDovL2NvbW11bml0eW5vdGlmaWNhdGlvbi5jb20vY2FwX21haW4ucGhwP29mZmljZT01NTI5MA==

Phone Number: 505-827-9297

NEW YORK

Website: http://www.criminaljustice.ny.gov/SomsSUBDirectory/search_index.jsp

Phone Number: 800-262-3257

NORTH CAROLINA

Website: <http://sexoffender.ncsbi.gov/>

Email Link: <http://sexoffender.ncsbi.gov/contact.aspx>

NORTH DAKOTA

Website: <http://www.sexoffender.nd.gov/>

Phone Number: 701-328-5500

OHIO

Website: http://www.communitynotification.com/cap_main.php?office=55149

Phone Number: 866-406-4534

OKLAHOMA

Website: [Search \(ok.gov\)](#)

Email Address: osor@doc.state.ok.us

OREGON

Website: <http://sexoffenders.oregon.gov/ConditionsOfUse>

Phone Number: 503-934-1258

PENNSYLVANIA

Website: <http://www.pameganslaw.state.pa.us/>

Phone Number: 866-771-3170

PUERTO RICO

Website: <http://sor.cjis.pr.gov/>

Phone Number: 787-721-2900

RHODE ISLAND

Website: https://www.sheriffalerts.com/cap_main.php?office=56404%20%5bsheriffalerts.com%5d

Phone Number: 401-764-5900

SOUTH CAROLINA

Website: <http://scor.sled.sc.gov/ConditionsOfUse.Aspx>

Phone Number: 803-896-2601

SOUTH DAKOTA

Website: <http://sor.sd.gov/>

Phone Number: 605-773-3331

TENNESSEE

Website: <https://www.tn.gov/tbi/general-information/tennessee-sex-offender-registry.html>

Phone Number: 888-837-4170

Email: tbisormgr@tn.gov

TEXAS

Website: <https://publicsite.dps.texas.gov/SexOffenderRegistry>

Phone Number: 512-424-2800

UTAH

Website: http://sheriffalerts.com/cap_main.php?office=54438

Phone Number: 801-495-7700

VERMONT

Website: https://www.communitynotification.com/cap_main.php?office=55275

Phone Number: 802-241-5400

VIRGINIA

Website: <http://sex-offender.vsp.virginia.gov/sor/>

Phone Number: 804-674-2825

WASHINGTON

Website: <http://www.icrimewatch.net/washington.php>

Phone Number: 360-486-2386

WEST VIRGINIA

Website: <https://apps.wv.gov/StatePolice/SexOffender/>

Phone Number: 304-746-2133

WISCONSIN

Website: <https://appsdoc.wi.gov/public>

Phone Number: 608-240-5830

WYOMING

Website: http://www.communitynotification.com/cap_main.php?office=55699

Phone Number: 307-777-7181

DRUG AND ALCOHOL POLICY**Policy Regarding the Possession, Sale, or Use of Alcohol at a Residency**

The possession, sale, or furnishing of alcohol at Residencies is governed by the Walden Drug and Alcohol policy and the state law where the Residency is located and only under certain circumstances is the consumption of alcohol permitted. However, the enforcement of state alcohol laws at Residencies is primarily the responsibility of local law enforcement.

Students, instructors, and staff are strictly prohibited from misusing controlled substances, intoxicants, alcohol, and prescription drugs while working, participating in the online classroom, or attending Residencies or other Walden University-sponsored activities.

Policy Regarding the Possession of Illegal Drugs at Residency

Walden University maintains a drug-free university. The possession, sale, manufacture, or distribution of any controlled substance at Residencies is illegal under federal and state laws. The enforcement of such laws at Residencies is primarily the responsibility of local law enforcement. Students, instructors, and staff are strictly prohibited from misusing controlled substances, intoxicants, alcohol, and prescription drugs while working, participating in the online classroom, or attending Residencies or other Walden University-sponsored activities. Violators are subject to university disciplinary action, criminal prosecution, fine and imprisonment.

Information Relating to the Legal Sanctions for Unlawful Possession of Alcohol and Drugs

a. **Alcohol Law Penalties.** The legal drinking age in all 50 states of the United States and the District of Columbia is 21 years of age. The legal drinking age in the U.S. Virgin Islands, Puerto Rico and Guam is 18 years of age. Persons under the legal drinking age who purchase, possess, or consume alcoholic beverages may be subject to fines or imprisonment depending on state law. Persons who knowingly furnish alcohol to minors are also subject to fines or imprisonment.

Specific information on state and local legal penalties for alcohol violations may be obtained on state law enforcement websites.

b. **Drug Law Penalties.** Under federal law, a conviction for possession of illicit drugs carries a prison sentence of up to three years and a minimum fine of up to \$5,000. The range of penalties for conviction of unlawful distribution of illicit drugs under federal law is summarized in the schedules of federal drug trafficking penalties that can be found online at: <https://www.dea.gov/pr/legis.shtml>. The severity of the sanctions imposed for both possession and distribution offenses depend on the quantity of drugs, prior convictions, and whether death or serious injury resulted. Sanctions may be increased for offenses, which involve distribution to minors or occur on or near a school or campus. In addition, other federal laws required or permit forfeiture of personal or real property used to illegally possess, facilitate possession, transport, or for concealment of a controlled substance. A person's right to purchase or receive a firearm or other federal benefits, such as student loans, grants, contracts, or professional or commercial licenses, may also be revoked or denied as a result of a drug conviction.

Specific information on state and local legal penalties for drug violations may be obtained on state law enforcement websites.

Drug or Alcohol Abuse Education Program

Walden University has a drug and alcohol abuse program available to students and employees. The information can be found at <https://www.waldenu.edu/-/media/walden/files/legal/adap-2021-walden.pdf?rev=f133a9c19af94df9965aa6f13cab9aca&hash=76B20FB959485908B04F09E93580D170>.

The Drug-Free Schools and Communities Act Amendments of 1989, as articulated in the Education Department General Regulations (EDGAR) Part 86, the "Drug-Free Schools and Campuses Regulations", require institutions of higher education (IHEs) to develop and implement programs to prevent the abuse of alcohol and the use of illicit drugs by students and employees, including faculty. In addition, IHEs are required to provide annual notification of the provisions of their alcohol and drug abuse prevention programs to students and employees, including faculty, and to conduct biennial reviews of the programs and their effectiveness. Walden University developed its Alcohol and Drug Abuse Prevention Program (the "Walden ADAP Program") to meet the requirements of the Drug-Free Schools and Communities Act Amendments of 1989, as articulated in the Education Department General Regulations (EDGAR) Part 86, the "Drug-Free Schools and Campuses Regulations".

Definitions

Addiction: A compulsive physiological need for alcohol or an illegal drug.

Alcohol or Alcoholic Beverage: Alcohol, liquor, brandy, malt liquor, whiskey, rum, gin, sake, beer, ale, wine, or any beverage containing one-half of one percent or more of alcohol by volume.

Controlled Substance: Any drug listed in schedules I through V or section 202 of the Controlled Substance Act (21 U.S.C. 812). (A list of controlled substances is available on the DEA website at: <https://www.deadiversion.usdoj.gov/21cfr/21usc/812.htm>).

Illegal or Illicit Drugs: A controlled substance in schedules I through V of section 202 of the Controlled Substance Act (21 U.S.C. 812) "illegal drugs" shall not mean the use of a controlled substance pursuant to a valid prescription or other uses authorized by law.

Substance Abuse: The misuse of a substance including alcohol or the use of a substance to an extent deemed deleterious or detrimental to the user, to others, or to society.

Information Relating to Health Risks from Drugs and Alcohol

- Employees, including faculty, of Walden University should be aware and informed that health risks associated with the use of illicit drugs and the abuse of alcohol can result in, but are not limited to a lowered immune system, damage to critical nerve cells, physical dependency, lung damage, heart problems, liver disease, physical and mental depression, increased infection, irreversible memory loss, personality changes and thought disorders.

- Alcohol consumption causes a number of marked changes in behavior. Even low doses significantly impair the judgment and coordination required to drive a car safely, increasing the likelihood that the driver will be involved in an accident. Low to moderate doses of alcohol also increases the incidence of a variety of aggressive acts, including spouse and child abuse.
- Moderate to high doses of alcohol cause marked impairments in higher mental functions, severely altering a person's ability to learn and remember information. Very high doses cause respiratory depression and death.
- Mothers who drink alcohol during pregnancy may give birth to infants with Fetal Alcohol Syndrome. These infants have irreversible physical abnormalities and mental retardation. In addition, research indicates that children of alcoholic parents are at greater risk than other youngsters of becoming alcoholics.
- Marijuana contains THC (Delta-9-tetrahydrocannabinol) which accounts for most of its psychoactive or mind-altering effects. The short-term effects of using marijuana include sleepiness, memory and concentration problems, impaired motor coordination, increased heart rate, dry mouth, and throat, and decreased social inhibitions. The long-term effects of using marijuana include impaired lung functioning, sexual problems, breast tissue development in men, and possible immune system damage.
- Stimulants increase the activity of the central nervous system. Examples include amphetamines, methamphetamines, cocaine, and crack which cause short-term elevations in mood, self-confidence, energy, heart rate and blood pressure. Potential difficulties associated with the more powerful stimulants such as these include possible physical addiction, psychoses, severe depressions, and anxiety syndromes such as panic attacks and obsessions. Additional health risks include seizures and cardiac arrest.
- Hallucinogens are substances that distort perception of reality. The most well-known hallucinogens include: phencyclidine (PCP), lysergic acid diethylamide (LSD), mescaline, and psilocybin. Under the influence of these drugs, the senses of direction, distance, and time become disoriented. They can produce unpredictable, erratic, and violent behavior in users that sometimes lead to serious injury and death. At high doses, LSD can cause convulsions, coma, heart, and lung failure, and even death.
- Sedatives/Tranquilizers are drugs used to reduce anxiety and tension. In some cases, they are used as sleep aids as well. Like alcohol, these drugs are central nervous system depressants. Examples include barbiturates such as amytal, Nembutal, and Seconal, as well as benzodiazepines such as Ativan, halcion, Librium, and Xanax. Rohypnol, a date rape drug, also falls into this category. Although specific effects may vary according to the particular drug, these drugs typically induce a state of relaxation and drowsiness. At high doses, dizziness, slurred speech, impaired coordination, and amnesia may occur. Health hazards include risk for addiction and coma and/or death from overdose.
- Narcotics are painkillers or analgesics. These drugs include morphine, heroin, codeine, and dilaudid, all of which are derived from opium. Synthetic narcotics include drugs such as Demerol, Percodan, and Darvon. These drugs tend to reduce sensory feeling and sensitivity to all kinds, to pleasure as well as pain. In large doses, they induce drowsiness, mental clouding, lethargy, and even sleep. They are highly addictive. Overdose risks include convulsions, coma, and death.
- Anabolic steroids are synthetic derivatives of the male hormone testosterone. These derivatives of testosterone promote the growth of skeletal muscle and increase lean body mass. The long-term, high dose effects of steroid use are largely unknown. Major side effects of anabolic steroid use include liver tumors, jaundice, fluid retention, high blood pressure, acne, and trembling. Aggression and mood swings as well as other psychiatric side effects may result from their abuse.
- Students and employees should note that the above listing is not intended as all- inclusive. Further information may be gathered from a physician.

University Resources on Alcohol and Drug Abuse Prevention and Awareness

Walden distributes materials and offers resources related to alcohol and drug abuse prevention awareness, including the distribution of communications instructing students on how to access written materials relating to alcohol and drug abuse prevention.

Counseling, Treatment and Support Group Resources for Alcohol and Drug Abuse and Prevention

In recognition of the dangers of substance abuse, Walden offers the following counseling and treatment resources:

Walden University Student Assistance Program

Phone: 1-866-465-8942 (TDD: 1-800-697-0353; international: 1-312-595-0074).

Online: Visit ComPsych's website, titled [GuidanceResources](#), and enter the Web ID "Walden" under the REGISTER tab.

Walden Employee Assistance Program

To access Ginger, follow these steps:

1. Download the Ginger Emotional Support app: • [Apple](#)
• [Google Play](#)
2. In the app, tap "Get Started" and enter your work email address.
3. Follow the instructions sent to your inbox.

Alcoholics Anonymous

Phone: (212) 870-3400

Online: <https://www.aa.org/>

Narcotics Anonymous

Phone: (818) 773-9999

Online: <https://www.na.org/meetingsearch/>

Disciplinary Sanctions for Alcohol or Drug Related Violations

Walden University will not excuse misconduct by students, faculty, or employees whose judgment is impaired due to substance abuse. Violation of the Walden University Alcohol and Drug Policy and/or any municipal, state, or federal law or regulation may result in disciplinary action, including but not limited to a warning, a remediation plan, and up to and including dismissal of a student, even for a first-time offense. In addition to the sanctions imposed by Walden, individuals who have violated local, state, and federal law regarding possession, use, and/or distribution of alcohol and other drugs may be referred by the school to the appropriate authorities for arrest and prosecution. Employees, including faculty, found in violation of this policy are subject to disciplinary action, up to and including termination of employment, as provided in the applicable employee handbook. Students should refer to the [Walden University Student Handbook](#).

STUDENT CODE OF CONDUCT

Each student is responsible for becoming familiar with the Code of Conduct, as published in this *Walden University Student Handbook* and any subsequent updates. If a student is unsure about the application or interpretation of the Code of Conduct, it is her or his responsibility to seek clarification from university administrators.

Students and other members of the university community should also refer to the [Technology Policies](#) section of this *Walden University Student Handbook* regarding sanctions for violations related to the use of university networks, email services, computer systems, or other information technologies. Any violation of the Technology Policies may also constitute a violation of the university Code of Conduct.

The Code of Conduct addresses the university's expectations of students in four areas: nondiscrimination, nonharassment, professional conduct, and academic integrity.

1. **Nondiscrimination:** Walden University does not discriminate or tolerate discrimination by or against members of the university community on the basis of race, color, national origin, gender, sexual orientation, religion, age, mental or physical disability, veteran status, marital status, or other protected characteristics in the admission to, access to, or treatment or employment in any of its programs or activities.
2. **Nonharassment:** Walden University is committed to maintaining an environment that is free of unwelcome and disrespectful conduct and communication and in which university members feel safe and comfortable. As such, it is a violation of this policy for any Walden employee, instructor, or student to engage in harassing conduct or communication directed toward another employee, instructor, student, or any other person affiliated with the university. Sexual harassment can include, but is not limited to, unwelcome sexual advances; requests for sexual favors; unwelcome physical contact; inappropriate emails; obscene or harassing phone calls or jokes; suggestive gestures, sounds, or stares; and other verbal or physical conduct of a sexual nature when:
 - Submission to such conduct is made, either explicitly or implicitly, a term or condition of a student's academic progress;
 - Submission to or rejection of such conduct by an individual is used as a basis for decisions affecting assessment of academic progress; or
 - Such conduct, by instructors, staff, or students, including between students, has the purpose or effect of interfering with academic performance or creating an intimidating, hostile, or offensive environment.

Unwelcome conduct of this nature, directed at others and based on other protected characteristics, such as race, sexual orientation, gender, religion, age, and other characteristics as set forth in the university's nondiscrimination policy, violates both the nonharassment policy and the nondiscrimination policy.

3. **Professional Conduct:** As part of its commitment to integrity and respect in the community in which it operates, Walden University expects that its students will conduct themselves in a professional and respectful manner at all times, both when interacting within the university community and when representing the university at events outside the institution. In that regard, students will not at any time engage in unduly disruptive, threatening, unethical, disrespectful, or abusive conduct toward other members of the university community, including fellow students, instructors, and staff.
4. **Academic Integrity:** Walden University considers academic integrity to be essential for each student's intellectual development. As an institution fundamentally concerned with the free exchange of ideas, the university depends on the academic integrity of each of its members. In the spirit of this free exchange, students and instructors of Walden recognize the necessity and accept the responsibility for academic integrity. A student who enrolls at the university thereby agrees to respect and acknowledge the research and ideas of others in his or her work and to abide by those regulations governing work stipulated by the academic unit or academic program, and, in turn, the instructor. Student submissions will be routinely searched for offending material by an online originality check program.

The university also recognizes that, in an educational community, the pressure to succeed can often be intense. Students who feel overwhelmed by their academic and personal obligations may be tempted to take shortcuts that may compromise their honesty and integrity. To help students derive the full benefit of the educational opportunity provided by the university, this section defines a violation of academic integrity and gives examples of actions that are considered dishonest. The university encourages students who may have questions or concerns about the definition and forms of academic integrity violations described herein to contact their faculty mentor, course instructor, or student success advisor.

A violation of academic integrity is any action or attempted action that may result in creating an unfair academic advantage for the student or an unfair academic advantage or disadvantage for any other member or members of the academic community.

Student work is monitored for evidence of plagiarism, using an antiplagiarism application, database, or service of Walden's choosing. Students will be required to submit their work to such a service in advance of course assignment deadlines. Students grant to Walden, Walden's faculty members, and Walden's faculty assistants a limited license to review work submitted for the purpose of comment, criticism, and grading of the work; to distribute the work to other Walden students for educational purposes; to use the work for internal training purposes; to submit the work to the antiplagiarism application, database, or service of Walden's choosing; to make and retain copies of the work; to image the work for computerized grading; and to archive certain work in a publicly accessible collection.

Academic integrity violations include the following:

a. Plagiarism. Plagiarism is defined as use of intellectual material produced by another person without acknowledging its source. For example:

- Wholesale copying of passages from works of others into an assignment, paper, discussion board posting, or dissertation without acknowledgment;
- Using the views, opinions, or insights of another without acknowledgment; and/or
- Paraphrasing another person's characteristic or original phraseology, metaphor, or other literary device without acknowledgment.

b. Students' Misuse of Their Own Scholarly Work

- During their studies at Walden, students may write on the same topic for a second, third, or fourth time; regardless, their writing is expected to reflect new approaches and insights into that topic to demonstrate intellectual growth.
- Walden recognizes that there may be some overlap between the requirements, assignments, and inquiry for different courses and KAM demonstrations. In general, students may use only small portions of documents as background or foundational material for additional development in a subsequent assignment or non-capstone research project. Students may not merely copy and paste substantial sections from one paper or KAM to another. Any use of prior work is at the discretion of the current instructor, and students must receive prior approval from their current instructor, who may request a copy of the previous work. Fair use laws must be respected for published documents.
- When using their scholarly work in subsequent published research, students should cite themselves as a primary author and their previous coursework or KAM demonstrations as unpublished papers as shown in The Publication Manual of the American Psychological Association. An exception to this requirement is when students use prior work from courses or KAMS in their doctoral capstone projects (i.e., doctoral studies, projects, or dissertations). In this situation, students may use work developed initially in courses or KAMS specifically to build toward the final capstone project; however, students and committees need to make sure the most current literature and evolution of ideas are reflected in the final capstone product.

c. Cheating. Cheating is defined as fraud, deceit, or dishonesty in an academic assignment. It includes using or attempting to use materials, or assisting others in using materials, that are prohibited or inappropriate in the context of the academic assignment in question. For example:

- Copying or attempting to copy from others during an exam or on an assignment;
- Communicating answers with another person during an exam;
- Preprogramming a calculator to contain answers or other unauthorized information for exams;
- Using unauthorized materials, prepared answers, written notes, or concealed information during an exam;
- Allowing others to do an assignment or portion of an assignment, including the use of a commercial term paper service;
- Submitting the same assignment for more than one course without the prior approval of all the instructors involved (see the ["Students' Misuse of Their Own Scholarly Work"](#) section above for more information);
- Collaborating on an exam or assignment with any other person without prior approval from the course instructor; and/or
- Taking an exam for another person or having someone take an exam for you.

d. Providing False Information. For example:

- Furnishing false information in the context of an academic assignment;
- Fabricating or altering information or data and presenting it as legitimate; and/or
- Providing false or misleading information to an instructor or any other university staff member.

e. Copyright Violation. Walden recognizes and respects intellectual property rights. As part of its mission to maintain the highest standards for ethical conduct, the university requires its employees, instructors, students, and other university community members to use copyrighted materials in a lawful manner.

No employee, instructor, student, or other university community member may reproduce any copyrighted work in print, video, or electronic form in violation of the law. The easiest way to

avoid violating the law is by receiving the express written permission of the copyright holder. Copyright laws in the United States may protect works even if they are not registered with the U.S. Copyright Office and even if they do not carry the copyright symbol.

Copyrighted works include, but are not limited to, printed articles from publications, television and radio programs, videotapes, music performances, photographs, training materials, manuals, documentation, software programs, databases, World Wide Web pages, and CD-ROMs. In general, the laws that apply to printed materials are also applicable to visual and electronic media.

Walden directs its employees, instructors, students, and other university community members to obtain appropriate permission from copyright holders directly, or from their licensing representative, when reproduction or duplication exceeds fair use. The fair use doctrine allows limited exemptions to copyright infringement liability when copyrighted works are used for purposes such as comment, criticism, teaching, scholarship, or research, particularly when the use of the work is limited in amount and scope and is for noncommercial purposes. To learn more about fair use, visit [Copyright Law of the United States of America](#).

f. Misrepresentation of Credentials. Statements made and documents supplied by Walden applicants and students must be complete and accurate. The university will not tolerate any misrepresentation by a student or applicant of past or current academic programs, degrees, or professional accomplishments. If unexplained discrepancies appear between statements or documents provided to Walden and information obtained otherwise, except in the case of misspellings and other such inadvertent errors, applicants may be rejected for admission and enrolled students may be dismissed.

g. Theft or Damage of Property. For example:

- Sabotaging or stealing another person's assignment, paper, project, electronic hardware, or software;
- Obtaining improper access to, or electronically interfering with, the property of another person or the university via computer or other means; and/or
- Obtaining a copy of an assignment or exam prior to its approved release by the instructor.

h. Alteration of University Documents. For example:

- Forging an instructor's or university official's signature on any document;
- Submitting an altered transcript of grades to or from another institution or employer;
- Putting your name on, or copying, another person's paper or assignment; and/or
- Altering a previously graded exam or assignment for purposes of a grade appeal or for gaining points in a regarding process.

Student Appeals and Grievances

Students who wish to appeal a decision related to Code of Conduct violations are advised to first pursue less formal channels for conflict resolution before filing a formal written appeal or grievance.

1. Students with concerns involving academic decisions related to professional conduct or academic dismissal may pursue an academic appeal through the appeals process outlined in this *Walden University Student Handbook*.
2. Students with concerns involving the university's nondiscrimination, non harassment, or educational access policies are encouraged to first report their concerns to their dean or executive director or their designees to allow for appropriate review and investigation of the concerns. If this process does not adequately resolve the issue, the student can then proceed with filing a formal written grievance under the grievance process outlined in this *Walden University Student Handbook*. Often these types of concerns can be resolved without pursuing the formal grievance process.
3. Decisions of the dean or executive director or their designees related to academic integrity violations (other than academic dismissal), change of grade, program of study, or other decisions related specifically to the program, specialization, or concentration curriculum cannot be appealed.

Appeals Process

Students with concerns involving academic decisions related to professional conduct or academic dismissal may pursue an academic appeal to the chief academic officer through this appeals process.

To appeal, the student must submit an appeal to caoappeals@mail.waldenu.edu. The form requires a statement of the decision that constitutes the subject matter of the appeal, the grounds on which it is being challenged, and the reasons the student believes that the decision was improperly made. The submission must also include a description of the remedy sought and the informal efforts taken to date to resolve the matter. The appeal must include an allegation of any adverse effects on the student, known to her or him at the time of filing.

This appeal must specifically address the following:

- Were the proper facts and criteria brought to bear on the decision?
- Were improper or extraneous facts or criteria brought to bear that substantially affected the decision to the detriment of the student?
- Were there any procedural irregularities that substantially affected the outcome of the matter to the detriment of the student?
- Given the proper facts, criteria, and procedures, was the decision one that a person in the position of the decision maker might reasonably have made?

This appeal may not be made on the basis of general dissatisfaction with the decision of the dean or executive director or their designees.

The appeal must be submitted to the chief academic officer of the university. An appeal and all related materials or documents must be submitted electronically within 30 calendar days of the last day of classes of the academic term in which the adverse decision occurred or should reasonably have been discovered. A delay in filing an appeal may, taking all circumstances into account, constitute grounds for its rejection.

The chief academic officer may remand the matter for further consideration to a lower administrative level (including the level at which the original appeal arose), to the coordinator for student academic integrity and conduct review, or to the university ombudsperson, unless the ombudsperson has been previously involved in addressing the issue that gave rise to the appeal. The chief academic officer may attempt to resolve the matter informally, provide a decision on the appeal, or refer the appeal, or any issue therein, to a three-person panel consisting of individuals not associated with the academic unit in which the original appeal was filed. This panel shall consider the matter and report to the chief academic officer as the latter directs.

Should the chief academic officer resolve the matter informally or decide the appeal, he or she shall notify the student (and the party against whose decision the appeal has been filed) in writing of the disposition made of the appeal. Should the chief academic officer refer the appeal, he or she shall inform the student (and the party against whose decision the appeal has been filed) in writing of any referral of the matter and shall specify the matters referred and the directions to the committee or person to whom the referral is made (including the time frame within which the committee or person is to report back to the chief academic officer).

Normally no more than 60 calendar days should elapse between the filing of the appeal and the disposition by the chief academic officer. If, because of absence of key persons from the university or other exigencies, the chief academic officer judges that prompt disposition is not possible, he or she shall

inform the student (and the party against whose decision the appeal has been filed) of this fact in writing, and provide them with an estimate of when a disposition can be expected. The disposition of the appeal, as reported by the chief academic officer, shall be final and not subject to further appeal.

Grievance Process

A student alleging discrimination, harassment, or failure of educational access may contact his or her dean or executive director or their designees, for immediate reporting, counseling, and investigation of the concerns. The formal complaint must be submitted via email to the dean or executive director or their designees. After attempting this method of resolution, a student may file a grievance according to the grievance procedure set forth in this section. There shall be no retaliation against anyone who files a grievance or otherwise reports discrimination or harassment. Filing of a grievance may, however, initiate reassignment of one or more of the involved parties for a reasonable period to allow for an appropriate investigation of the situation.

The right to confidentiality, both of the complainant and of the accused, will be respected to the extent possible insofar as it does not interfere with the institution's legal obligation or ability to investigate allegations of misconduct brought to the university's attention or to take corrective action when it is found that misconduct has occurred.

A formal grievance must be identified as such in writing and directed to the chief academic officer or Student Affairs via email to studentaffairs@mail.waldenu.edu. The grievance normally should originate no more than 30 calendar days following a resolution decision by the dean or executive director or their designees concerning the complaint or conduct that gave rise to the grievance.

The chief academic officer initially reviews the case to determine appropriate action, which can include referring the matter to an appropriate university office for review. If the conflict is resolved at this stage, no further action is necessary. If the conflict cannot be resolved in this way, the chief academic officer appoints a hearing committee to review the allegations.

A written decision from the committee will be delivered in as timely a manner as possible while allowing for appropriate investigation and consideration, not to exceed 60 calendar days from the date the complaint is filed with the chief academic officer, unless the committee notifies the parties of the need for an extension in order to properly complete the process. The written records are confidential but available for on-site review by the person(s) directly involved.

The decision of the chief academic officer is, in all cases, final, and not subject to appeal.

Note to Arizona Residents

The Arizona State Board for Private Postsecondary Education requires all institutions to have a published grievance procedure that includes reference to a student's right to file a complaint with the Arizona state board. In the event a complaint from an Arizona student cannot be resolved after exhausting the institution's grievance procedure, the student may file a complaint with the Arizona State Board for Private Postsecondary Education. The student must contact the state board for further details. Arizona State Board for Private Postsecondary Education, 1740 W. Adams Street, #3008, Phoenix, AZ 85007; 1-602-542-5709; <https://ppse.az.gov/>.

Note to Connecticut Residents

If the complaint is not resolved at the school level through its complaint procedure, students may file a complaint with the Connecticut Office of Higher Education, 450 Columbus Boulevard, Suite 510, Hartford, CT 06103-41, 860-947-1800 or via <http://www.ctohe.org/StudentComplaints.shtml>.

Note to Georgia Residents

If the complaint is not resolved at the school level through its complaint procedure, students may file a complaint with the Georgia Nonpublic Postsecondary Education Commission (NPEC), 2082 East Exchange Place, Suite 220, Tucker, GA 30084-3300. The NPEC telephone number is 770-414-3300.

The NPEC has provided an online form to be used by students for filing complaints; this can be found at the following Web address: <https://gnpec.georgia.gov/webform/gnpec-authorized-school-student-complaint-form>

Note to Iowa Residents

Walden University is a registered institution with the Iowa College Student Aid Commission. Students may contact the commission with questions or complaints at the following address: Iowa College Student Aid Commission, 475 SW 5th St., Suite D., Des Moines, IA 50309-4608. Students may also call (877) 272-4456, or submit a complaint online at <https://iowacollegeaid.gov/StudentComplaintForm>.

Note to Kansas Residents

If the complaint cannot be resolved at the school level through its complaint procedure, students may file a complaint with the Kansas Board of Regents. The complaint form is available at the following link. http://www.kansasregents.org/academic_affairs/private_out_of_state/complaint_process

Note to Maryland Residents

Any complaints can be directed to the Maryland Attorney General, Consumer Protection Division, 200 St. Paul St., Baltimore, MD 21202, 410-528-8662 or 888-743-0823 (toll-free).

Note to New Mexico Residents

The New Mexico Higher Education Department requires that all students know of their rights in a grievance situation, including contacting the NMHED/PPSD, 2044 Galisteo Street, Suite 4, Santa Fe, NM 87505-2100, 1-505-476-8442, or 505-476-8416 if grievances are not resolved at the institutional level. Students can also download the applicable forms at: <https://hed.state.nm.us/students-parents/student-complaints>

Note to North Carolina Residents

If the complaint is not resolved at the school level through its complaint procedure, students may file a complaint with North Carolina Postsecondary Education Complaints, c/o Student Complaints, University of North Carolina System Office, 910 Raleigh Rd., Chapel Hill, NC 27515-2688, or studentcomplaint@northcarolina.edu, or via the online form at <https://studentcomplaints.northcarolina.edu/form>. Students who wish to review the Guaranty Bond should contact the Walden Office of the President.

Note to South Carolina Residents

If the complaint cannot be resolved at the school level through its complaint procedure, students may file a complaint with the South Carolina Commission on Higher Education. The complaint form is available at the following link. http://www.che.sc.gov/CHE_Docs/AcademicAffairs/License/Complaint_procedures_and_form.pdf.

Note to Tennessee Residents

The Tennessee Higher Education Commission requires that all students know of their rights in a grievance situation, including contacting the Tennessee Higher Education Commission, Nashville, TN 37243-0830, 1-615-741-5293, if grievances are not resolved at the institutional level.

Note to Texas Residents

If the complaint cannot be resolved at the school level through its complaint process, students may file a complaint with the Texas Higher Education Coordinating Board (THECB). Students can contact THECB Office of General Counsel, PO Box 12788, Austin, TX 78711, (512) 427-6101, or access the THECB Student Complaints webpage <http://www.thecb.state.tx.us/links/student-complaints/>. Rules for governing student complaints can be viewed on the Texas Administrative Code

website [http://texreg.sos.state.tx.us/public/readtac\\$ext.ViewTAC?tac_view=5&ti=19&pt=1&ch=1&sch=E&rl=Y](http://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=5&ti=19&pt=1&ch=1&sch=E&rl=Y).

Note to Utah Residents

The Utah Department of Commerce is available to provide assistance to students should they have a complaint. Contact the Utah Division of Consumer Protection, 160 East 300 South, 2nd Floor, P.O. Box 146704, Salt Lake City, Utah 84114-6704. A description of the procedures can be found at the following link: <https://dcp.utah.gov/consumers/>.

STUDENT RIGHTS UNDER FERPA

(The Family Educational Rights and Privacy Act)

Walden University retains its academic records based on the guidelines recommended by the American Association of Collegiate Registrars and Admissions Officers (AACRAO).

The Family Educational Rights and Privacy Act (FERPA) of 1974 affords students certain rights with respect to their education records. These rights include the following:

1. The right to **inspect and review** their education records within 45 calendar days of when the university receives a request for access. Students should submit to the registrar a written request identifying the records they want to inspect. The registrar will make arrangements for access and notify the students of when and how the records will be made available for inspection. The university may charge a fee for copies of records.
2. The right to **request the amendment** of their education records that students believe are inaccurate, misleading, or otherwise in violation of student privacy rights under FERPA. Students should write to the registrar, clearly identify the part of their records they want changed, and specify why that change should be made. If the university decides not to amend a record as requested, the university notifies the student of the decision and advises the student of his or her right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.
3. The right to provide **written consent before the university discloses personally identifiable information** contained in their education records, except to the extent that FERPA authorizes disclosure without consent. One exception, which permits disclosure without consent, is disclosure to school officials with legitimate educational interests. A *school official* is a person employed by the university in an administrative, supervisory, academic or research, or support staff position (including law enforcement unit personnel and health staff); a person or company with whom the university has contracted (such as an attorney, auditor, or collection agent); a person serving on the Board of Trustees; or a student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing his or her tasks. A school official has a *legitimate educational interest* if the official needs to review an education record to fulfill his or her professional responsibilities for the university. Upon request, the university also discloses education records without consent to officials of another school in which a student seeks or intends to enroll.

The university may disclose educational records without the written consent of students to officials at schools, colleges, or universities participating in cross-enrollment programs for the furtherance of the educational or business purposes of the student or college.

4. The **right to file a complaint** with the U.S. Department of Education concerning alleged failures by the university to comply with the requirements of FERPA. The office that administers FERPA is

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-5901

Disclosure of Student Information Required by the Solomon Amendment

The Solomon Amendment is a federal law that requires Walden University to provide certain student information to military recruiters. The Department of Education has determined the Solomon Amendment supersedes FERPA; therefore, Walden is obligated to release requested “student recruiting information” if contained in a student record. Student recruiting information may include the student’s name, address, telephone number, email address, age or year of birth, place of birth, class level, current major, and most recent educational institution attended. Information released is limited to students enrolled in the current semester or the previous semester.

Under FERPA, currently enrolled students have the right to request suppression of designated directory information. If a student requests that their directory information be withheld under FERPA, this protection will be honored under the Solomon Amendment and the student’s records will not be released. To request suppression of directory information, students and alumni can submit a written request to the Customer Care Team at reghelp@mail.waldenu.edu at any time.

DIRECTORY INFORMATION

The Family Educational Rights and Privacy Act (FERPA) designates certain student information as “Directory Information” and gives the institution the right to disclose such information without having to ask students’ permission. The items listed below as “Directory Information” may be released for any purpose at the discretion of the institution. Under the provisions of FERPA, students have the right to withhold the disclosure of any or all of the categories of information listed below. **The following information will be released unless students specifically request that their information be withheld:**

Directory Information:

Name, address, and telephone number

- Email address
- Major field of study
- Enrollment status
- Program start date
- Dates of attendance
- Degrees and awards
- Previous institutions attended

To Withhold Information

TO REQUEST SUPPRESSION OF DIRECTORY INFORMATION, STUDENTS AND ALUMNI CAN SUBMIT A WRITTEN REQUEST TO THE WALDEN REGISTRAR AT REGHELP@MAIL.WALDENU.EDU AT ANY TIME.

VOTER REGISTRATION

As a participant in Title IV Federal Student Financial Aid programs, Walden University would like to remind students who are U.S. citizens of the importance of registering to vote.

If you are interested in participating in local, state, or national elections, please visit the Election Assistance Commission website at www.eac.gov/voter_resources/register_to_vote.aspx to learn how you can register to vote.

UNAUTHORIZED DISTRIBUTION OF COPYRIGHTED MATERIALS

Walden University strives to provide access to varied materials, services and equipment for students, faculty and staff and does not knowingly condone policies or practices that constitute an infringement of Federal copyright law.

Transmitting or downloading any material that you do not have the right to make available and that infringes any patent, trademark, trade secret, copyright or other proprietary rights of any party is prohibited.

Installing or distributing pirated or unlicensed software is also forbidden. Violation of these requirements may subject students, faculty and staff to civil and criminal liabilities. Students, faculty or staff who violate federal copyright law do so at their own risk. Copyright status is applied to a work as soon as it is created. Users should assume that all writings and images are copyrighted.

Title 17 of the United States Code (17 USC §501 et seq.) outlines remedies for copyright infringement that may include some or all of the following: obtaining an injunction to stop the infringing activity; impounding and disposing of the infringing articles; an award to the copyright owner of actual damages and the profits of the infringer, or in the alternative, an award of statutory damages which may be increased if the infringement is found to be willful; an award of two times the amount of the license fee a copyright owner could have gotten; an award of the full costs incurred in bringing an infringement action, and the award of attorney's fees; and for criminal copyright infringement, fines and imprisonment.

Walden University maintains a campus network to support and enhance the academic and administrative needs of our students, faculty and staff. Walden University is required by Federal Law – H.R. 4137 to make an annual disclosure informing students that illegal distribution of copyrighted materials may lead to civil and/or criminal penalties. Walden University takes steps to detect and punish users who illegally distribute copyrighted materials.

Walden University reserves the right to suspend or terminate network access to any campus user that violates this policy and Network access may be suspended if any use is impacting the operations of the network. Violations may be reported to appropriate authorities for criminal or civil prosecution. The existence and imposition of sanctions do not protect members of the campus community from any legal action by external entities.

Alternatives to Illegal Downloading

Illegal downloads hurt artists and deter the incentive to create. U.S. laws protect the rights of individuals regarding their own works. Below are lists of sites that offer free or inexpensive products that you can use without violating copyright law.

FREE AND LEGAL

Clipart:

<http://www.coolarchive.com/>

<http://www.clipart.com/>

Fonts:

<http://www.blambot.com/>

<http://www.fonts.com/>

Photos:

<https://pixabay.com/photos/>

<https://all-free-download.com/free-photos/>

Music:

<https://www.epidemicsound.com/>



ADT^ALEM
GLOBAL EDUCATION

Code of Conduct and Ethics

TABLE OF CONTENTS

- 3 Applying Our Values
- 7 Our Responsibilities to Our Community
- 14 Our Responsibilities to Our Partners and the Public
- 22 Our Responsibilities as an International Organization

Dear Colleagues,

As members of the Adtalem Global Education community, we are guided by our TEACH Values, which inform everything we do – putting the team first (Teamwork); building positive spirit and initiative (Energy); taking ownership and responsibility for our actions (Accountability); operating with a shared sense of responsibility and empathy for others (Community); and serving our students and one another with care (Heart).

Our values of Accountability and Community are the foundation of the Adtalem Code of Conduct and Ethics. Accountability is taking ownership for our own actions, demonstrating courage to speak up regarding the actions of others if those actions do not align with Adtalem Global Education’s standards of conduct, and acting with the utmost integrity in all that we do. Our value of Community allows us to respect our shared values but also to celebrate our differences through mutual respect for all of our colleagues and students.

The way we conduct ourselves is essential to our continued success in an industry that is heavily regulated and scrutinized. Even more important, it is critical to maintaining our reputation among students as the place where they can bring their educational and career dreams to life, among colleagues as a great place to work and among our communities as an organization that is committed to Doing Well By Doing Good. Complying with international, federal, state and

local regulations is only the beginning. We should – and do – go beyond what is legally required. All of us, regardless of our level or role, are responsible for acting with the utmost personal and professional integrity every day.

Because we place such a high priority on our ethical conduct, it's important that all of us:

- Read this Code and apply it to our roles at Adtalem
- Use the Code to learn how we can ask for advice or get answers to questions about Adtalem's policies and expectations
- Keep the Code on hand for future reference

Thank you for your commitment to acting with integrity in support of our Vision, and for your dedication to our students.

Stephen W. Beard

President and CEO

Applying Our Values

Our Values – Teamwork, Energy, Accountability, Community and Heart – support a unique culture at Adtalem that sets us apart and defines who we are as an organization.

Our Culture of Care is continually renewed by the choices and actions each of us makes every day. Our Code of Conduct and Ethics ("Code"), together with our policies and other resources, is intended to help guide us when we are faced with ethics or compliance decisions or when we have questions about what to do in specific situations.

Who Needs to Follow Our Code

Our Code applies to all Adtalem colleagues including officers, directors and full- and part-time colleagues and faculty. It applies across our family of educational institutions, everywhere we operate.

The actions of customers, vendors, agents, and other third parties who work with us can have an impact on our reputation. For this reason, we strive to work only with third parties that share our commitment to ethics and compliance, and we expect them to act in a way that is consistent with our

Code. We will take the appropriate measures where we believe they have not met our high standards.



TO LEARN MORE

Adtalem Global Education's Vendor Code of Conduct.

How to Use This Code

No code of conduct can cover every possible situation, and this Code is meant to be a living document. This is why we rely on one another to use good judgment and to speak up whenever we have questions or concerns. In addition, Adtalem and each of our institutions have more detailed policies governing our day-to-day work, and you are responsible for knowing, understanding and complying with those policies in addition to this Code.

The application of each section of this Code may vary from institution to institution. When an institution's policy or local law is stricter than the standards in this Code, follow your institution's policy or local law. When in doubt, contact Integrity and Compliance for guidance or submit a question to the Speak Up HelpSite or HelpLine.

As a global organization based in the United States, we must comply with the laws of the United States, as well as the laws of the countries in which we operate. Each of us has an important responsibility to know and to follow the laws that apply to our roles in the countries in which we operate. If you are a manager, you are responsible for ensuring that your direct reports and other colleagues are familiar with the local laws and policies that apply to them. For more information about the country- or state-specific laws that may apply to you, consult with your assigned Adtalem Legal representative.

Our Expectations

Adtalem must always meet the highest standards of integrity and ethical conduct. That's why all colleagues are encouraged to:

- Hold ourselves and one another accountable for complying with the law, regulations, this Code and Adtalem and institutional policies, even when doing so could interfere with achieving a business goal.
- Pay particular attention to the policies that are relevant to their responsibilities.
- Refrain from asking anyone to do something that is improper or unethical.
- Promptly report concerns about possible violations of laws, regulations, this Code and other Adtalem policies to your manager or any of the resources listed in this Code.
- Cooperate and tell the whole truth when responding to an audit, investigation or regulatory review.
- Always comply with Adtalem's records retention policies, and never alter or destroy records other than in strict compliance with such policies.
- Once a year, read, acknowledge and commit to complying with the Code.

REMEMBER: No excuse will ever be acceptable for violating laws, regulations, the Code or our policies.

Managers' Additional Responsibilities

Colleagues who manage or supervise others have additional responsibilities, including:

- Leading by example. Be a resource for others. Talk to your colleagues and business partners about how the Code and our policies

apply to their daily work and listen to their concerns and questions.

- Working proactively and on an ongoing basis to ensure your colleagues are trained and well-versed in the rules that apply to their roles.

- Creating an environment where everyone feels comfortable asking questions and reporting potential violations.
- Encouraging your colleagues to complete training.
- If you oversee third parties working with Adtalem or any of its institutions or companies, ensuring that they understand our Code, the Vendor Code of Conduct and their responsibilities.
- Asking Integrity and Compliance for help when faced with ethical or compliance matters that you are unsure how to handle.
- Creating a work environment free of discrimination and harassment.

Q&A

I'm a manager and I'm not clear what I should do if someone comes to me with a potential breach of the Code – and what if it involves a senior leader?

No matter who the allegation involves, you are encouraged to inform appropriate personnel so that the situation can be resolved. You may use any of the avenues for asking questions and reporting concerns that are listed in the Code. If for any reason you are uncomfortable making a report to a particular person, you can report the allegation using the Speak Up HelpSite.

If I observe misconduct in an area outside of my responsibilities, what should I do?

You are responsible primarily for the people who report to you, but all colleagues of Adtalem and its institutions and companies have a responsibility to report suspected misconduct that occurs even if outside of their reporting lines and, where appropriate, intervene to deter or stop any colleague misconduct. In many cases, the best approach is to talk first with the manager who oversees the area where the problem is occurring. However, if you are concerned about this being the best approach, you should talk to your manager, an HR representative, Adtalem Legal or Integrity and Compliance; you can also report the misconduct using the Speak Up HelpSite.

Accountability Under the Code

Violating relevant laws, regulations, the Code or our policies, or encouraging others to do so, may harm our reputation and expose you to disciplinary action up to, and including, immediate termination of employment. Certain

actions may also lead to legal proceedings against you, your fellow colleagues and/or Adtalem.

Colleagues are encouraged to check with Integrity and Compliance, askHR or your local HR representative for any specific local policies regarding potential misconduct and disciplinary or investigatory procedures.

Under limited circumstances, colleagues may also be subject to discipline for conduct outside of work, including, for example, activities that are discriminatory or harassing, may damage Adtalem's reputation or may be harmful to our students.

Speak Up: Ask Questions and Report Concerns

We expect colleagues to ask questions, raise concerns and contribute actively to the prevention of colleague misconduct. We work hard to promote a culture where everyone is comfortable speaking up in good faith without fear of retaliation. So, in addition to knowing and complying with the legal and policy requirements that apply to your role, we encourage you to speak up and take action when you know or suspect there is misconduct that may impact Adtalem.

When you are faced with a difficult compliance or ethics situation or dilemma, you should first refer to this Code and to the policies that apply to your role. If, after doing so, you are still unsure, you have several options:

- Contact your manager. Be as specific and detailed as possible, so that he or she understands your question or concerns.
- Contact Integrity and Compliance.
- Contact a member of the Adtalem Legal team, your local Human Resources representative or askHR.
- Go to the Speak Up HelpSite or HelpLine to ask a question or submit a report. You have the option to remain anonymous when you ask a question or report a known or suspected violation online or by phone.

Retaliation is Prohibited

We do not tolerate retaliation against anyone for raising concerns or reporting possible misconduct in good faith or for assisting in the investigation of possible misconduct.

If you think that you or someone you know has experienced retaliation, contact your manager, an HR representative, or Integrity and Compliance; you can also report the misconduct using the Speak Up HelpSite.

What to Expect When You Use Our Speak Up Resources

The Speak Up resources, the HelpSite and HelpLine noted below, are a confidential way to obtain answers to your questions and concerns and to report possible misconduct. The HelpSite and HelpLine are operated by an

independent company, is available 24 hours a day, seven days a week, and is multilingual.

When using the Speak Up resources, you will be given the option to ask a question or make a report online or by phone. If you telephone, the operator will listen to your concern or question, ask clarifying questions if necessary and then write a summary report. The summary will then be provided to Adtalem for assessment and further action as appropriate.

After making a report, you will receive an identification number to follow up about the report. Following up is especially important if you submit your report anonymously – an option that is available in most but not all of the countries where we operate. This identification number will enable you to report back with additional information and track the resolution of the case.

All reports will be kept confidential to the extent practical, except where disclosure is required for Adtalem to investigate a report or by applicable law or legal process.

Some countries, including many in the European Union, have specific rules on the use of the Speak Up HelpSite and HelpLine, which in some cases may limit the types of reports that can be accepted.

SPEAK UP RESOURCES Helpline

U.S.: 1.800.461.9330

North America SMS: 773.904.1074

St. Kitts: 1.720.514.4400

Barbados: 1.855.203.6928

St. Maarten: 1.720.514.4400

Help Site www.speakupadtalem.com

In order for the Speak Up resources to work effectively, reports and inquiries must be made in good faith. For this purpose, good faith simply means an honest belief that a report is true and accurate, even if the facts reported prove to be false. Colleagues found to have made bad-faith reports are subject to disciplinary action, up to and including immediate termination of employment. A bad-faith report means a report by a colleague that intentionally makes false claims of misconduct by a colleague, student or third party.

Making the Right Choice

You may find yourself in a situation in which you are uncertain about what to do. It may help to ask yourself: • Is it consistent with Adtalem's TEACH

Values?

- Would you be comfortable reading about it in the newspaper or listening to it in front of a jury?
- Would it be consistent with yours or Adtalem's reputation for excellence?
- Does it seem ethical to you and to those whose opinions you respect?
- Could the conduct harm our colleagues or students in any way?
- Is it legal and consistent with our policies and our Code? If your answer to any of these questions is "no," don't do it, and contact any of the resources listed in this Code for help.

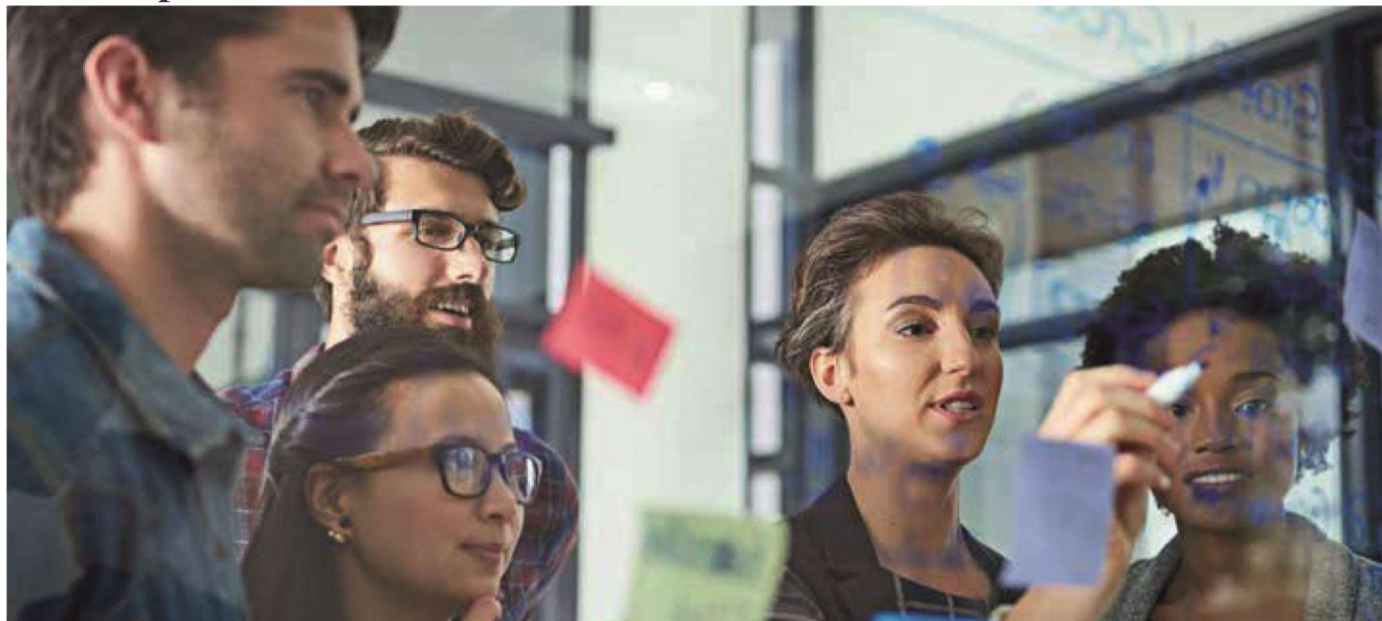
Closing the Loop

Ethics at Adtalem must continually evolve to stay current with new and emerging risk areas. Once you've made a decision, ask yourself the following additional question:

- Do you believe there are sufficient standards, policies and resources in place to address the issue you faced, or should more be done?

If your answer is "no" and you believe more should be done, contact Integrity and Compliance. Your suggestions will help us improve our Integrity and Compliance program.

Our Responsibilities to



Our Community

Through respect, collaboration and communication, we have built a dynamic team of talented colleagues. We work together with one purpose: to empower our students to achieve their educational and career goals.

Maintaining our team-based culture not only helps our students succeed, it also creates the setting for each of us to thrive personally while making a positive contribution to one another's success.

Value Diversity, Inclusion and Equal Opportunity

We value the unique contribution that each person brings to Adtalem. We treat everyone with respect and dignity and base all employment decisions on merit, experience and personal aptitude.

We do not discriminate on the basis of race, creed, color, religion, political affiliation, national origin, gender, age, disability, marital status, sexual orientation, gender identity, citizenship status or any other status protected by law.

Always Keep in Mind

- Treat everyone with respect.
- Encourage and listen to those who speak up, and work to create a culture where others feel valued and understood.
- If you manage people or are involved in recruitment and hiring, judge others based on performance, qualifications, abilities and potential.
- Avoid introducing unrelated considerations into your decisions. Use objective, quantifiable standards to the extent possible.

- Do not engage in favoritism for any reason.
- Respect colleagues' privacy, dignity and life outside of work.

Q&A

One of my colleagues sends emails containing jokes and derogatory comments about certain nationalities. They make

me uncomfortable, but no one else has spoken up about them. What should I do?

If you feel comfortable doing so and can do so safely, you should tell the colleague to stop the behavior. You are also encouraged to report your concerns to your manager, askHR or your local HR representative. You can also report your concerns on the Speak Up HelpLine or HelpSite. Sending such jokes doesn't support our core Values, and it violates our policies. By doing nothing, you are silently supporting behavior that can seriously erode the team environment.

Avoid Harassment and Intimidation

We treat our fellow colleagues with dignity and respect at all times. We do not tolerate any form of harassment or intimidation. This includes actions that can reasonably be considered as offensive or discriminatory, as well as any form of sexual harassment.

Always Keep in Mind

- Maintain a work environment that is professional and free from harassment.
- If possible and you can do so safely, be direct. Speak up and tell a person if you are upset by his or her actions or language, explain why and ask him or her to stop. You are encouraged to report your concerns to your manager, askHR or your local HR representative, or use the Speak Up HelpLine or HelpSite.
- Don't create, distribute or display obscene or discriminatory material, including written, recorded or electronically transmitted messages (such as email, instant messages and internet materials).
- Remember – harassment can occur between individuals of the same or different races or genders and can involve individuals or groups of colleagues.

Sex and Gender Misconduct, and Bullying

Adtalem is committed to maintaining an educational environment that is free from sex and/or gender misconduct. Sex and gender misconduct includes sexual harassment, sexual assault, rape, domestic violence, dating violence, stalking, sexual exploitation, and gender-based harassment. When a student has been a victim of sex and/or gender misconduct – even if the act did not occur on Adtalem property – it can impede his or her ability to fully participate in the educational benefits that we provide. Therefore, it is important that we all do our part to prevent all forms of sex and gender-based misconduct and support our student and colleague survivors.

Some colleagues have an affirmative duty under applicable law to report potential incidents of sex and/or gender-based misconduct. See Policy on Sex and Gender Based Misconduct Response and Prevention.

For more information, or if you have questions, contact the Title IX Coordinator at TitleIXCoordinator@adtalem.com or use the Speak Up HelpLine or HelpSite by calling 1.800.461.9330 or going to www.speakupadtalem.com.

Watch Out for These Red Flags

- Unwanted sexual advances or requests for sexual favors.
- Offensive physical contact such as patting, grabbing, pinching or brushing against another's body.
- Making sexual gestures and displaying offensive, sexually suggestive objects or pictures, cartoons or posters.
- Offensive, sexually oriented verbal kidding, teasing or jokes.
- Verbal abuse, threats or taunting based on a colleague's appearance, sexual orientation, beliefs or other characteristics protected by our policies and applicable laws.
- Intimidating or insulting behavior that humiliates, undermines or threatens another colleague, whether intentional or unintentional.

Q&A

While on a business trip, a colleague repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked him to stop, but he wouldn't. We weren't in the office and it was after hours. What should I do?

This type of conduct is not acceptable, regardless of whether it takes place in Adtalem's offices. Adtalem supports a work environment free from harassment, so don't wait for it to happen again to address it. If you feel safe and comfortable doing so, be firm and tell your colleague such actions are inappropriate and must be stopped. We take these matters very seriously and encourage you to report the problem to your manager, your local HR representative or askHR, or use the Speak Up HelpSite or HelpLine.

During my recent performance review, my manager was highly critical of my performance and I felt intimidated and bullied by the tone of the comments. Is this a violation of the Code and our policy against harassment?

Likely not. Bullying and intimidation are never acceptable, even during a manager's performance evaluation or while disciplining direct reports. However, articulating colleague performance expectations with statements such as "unless you improve your performance, your employment may be terminated" is not considered bullying or intimidation. If you have questions or concerns, you should contact askHR or your local HR representative, or use the Speak Up HelpLine or HelpSite.

Appropriate Relationships

Adtalem is committed to fostering workplace and academic environments that enhance our students' educational goals, our professional experiences

and the reputation of our educational institutions. For this reason, we expect colleagues to uphold the following standards for maintaining appropriate relationships in the workplace.

Colleague-to-colleague relationships

Colleagues are expected to refrain from hiring or otherwise working in the same reporting line with their own family members, spouses, relatives, domestic partners or with colleagues or third parties with whom they have a romantic or intimate relationship. Likewise, it is not acceptable for you to engage in an intimate relationship with another colleague if you can influence or control that colleague's professional or financial interests.

Colleague-to-student relationships

Under no circumstances are faculty members, administrative personnel or other colleagues permitted to engage in any romantic or intimate relationships with prospective or current students if they do at the time, or may in the future be able to, influence or control enrollment, counseling, supervisory, or grading activities or decisions affecting that student. You are encouraged to report improper relationships between students and colleagues to askHR, your local HR representative, Integrity and Compliance or via the Speak Up HelpLine or HelpSite.

Some institutions may have stricter standards regarding appropriate relationships than those set out in this Code.

Where that is the case, the stricter standards prevail.

For more information, or if you have questions, contact the head of academic affairs for your institution, askHR or your local HR representative, or use the Speak Up HelpLine or HelpSite.

Keep One Another Safe and Secure

Everyone – colleagues, students and visitors to our facilities – has a right to expect a safe and secure environment. A safe and secure environment is a critical part of providing a quality education for our students.

All colleagues and third parties who work with Adtalem are expected to understand and follow our safety and security policies and procedures. We must work together to keep our workplace free from hazards and foreseeable and preventable risks.

Adtalem provides each location with a set of standard requirements and procedures designed to keep colleagues safe. We also provide a framework for each location to follow when responding to incidents.

In addition, each campus has a designated Incident Commander who serves as the primary point of contact with regard to safety and security matters. For more information, or to raise a concern or report an incident, contact your local Incident Commander, your local campus leader, your local security department, or Adtalem's Security Office.

Always Keep in Mind

- Be alert to safety and security risks.
- Violence of any kind has no place at Adtalem. We will not tolerate any acts or threats of physical violence against co-workers, students, visitors or anyone else on our property, during business travel or at Adtalem, institution or company-sponsored events.
- Firearms or other weapons are not permitted on Adtalem property, parking lots, alternate work locations maintained by Adtalem, at Adtalem institution or company-sponsored events, unless the application of such policy would be prohibited by law.
- Maintain a neat, safe working environment by keeping work stations, aisles and other work spaces free from obstacles, wires and other potential hazards.

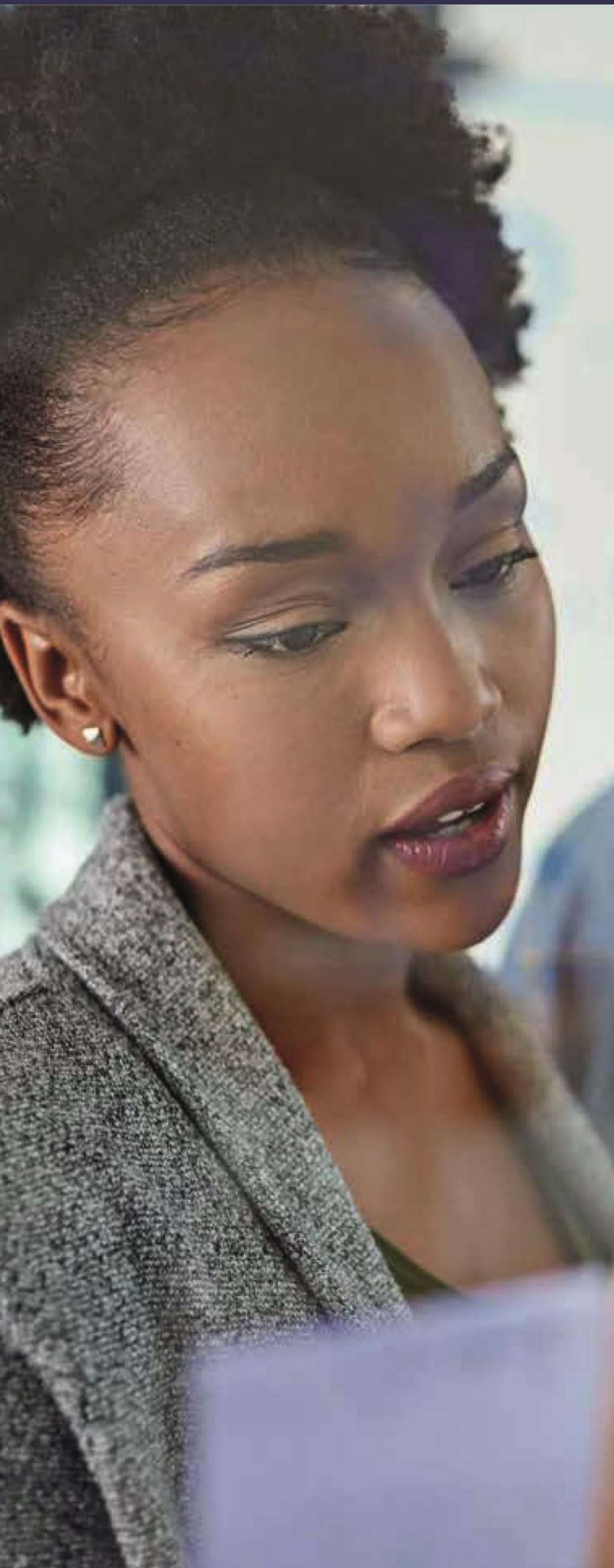


TO LEARN MORE

Adtalem Global Education's Colleague Handbook, "Substance Abuse" section.

Drug and Alcohol Use

The use of illegal drugs and alcohol goes against our commitment to a safe, healthy, secure and productive environment for colleagues, students and community. When your ability to do your job is impaired by the misuse or abuse of alcohol or drugs, you jeopardize the safety of others and potentially harm our reputation. While at work or on Adtalem business, you should be alert, not impaired, and always ready to carry out your work



duties. You should always respect local customs and laws pertaining to drug and alcohol use.

Accommodations

Consult with askHR or your local HR representative if you must take legal medications that could negatively affect your job performance in a material way or compromise someone's safety.

Alcohol and drug-related support

If you have a drug- or alcohol-related problem, we encourage you to seek assistance. If you are outside of the United States, please see your local HR representative. Alternatively, you can download and access the Ginger Emotional Support app: In the app, tap "Get Started," and enter your work email address. Follow the instructions sent to your inbox. From there, Ginger will work with you and recommend the level of support that is recommended. Additionally, if you are enrolled in an Adeptum medical plan, you can seek treatment directly on your own.

Q&A

Are subcontractors working on our premises expected to follow the same safety and security policies and procedures as colleagues?

Absolutely. Managers are responsible for ensuring that third parties at work on our premises understand and comply with all applicable policies, laws and regulations affecting that particular campus or location.

Respect Privacy and Protect Personal Information

We respect and protect the privacy of everyone who entrusts us with his or her personal information. This includes prospective, current and former students, our colleagues and third parties. Protecting this information is a legal requirement and a matter of trust.

As a global organization in a digitally connected environment, we respect all applicable laws relating to data privacy and security. Some information, generally referred to as Personally Identifiable Information (PII), requires an extra degree of care. PII is any data that could, by itself or in combination with other information, be used to identify an individual.

Always Keep in Mind

- Be accountable for protecting PII and stay informed about our PII-related policies.
- Only share personal information, including PII, with those who have a legitimate need to know and whose access is appropriately authorized.
- Never disclose a student's government-issued identification number; credit or debit card numbers or passwords.
- Never disclose academic records or student information to outside parties without the student's consent, unless required by law or as permitted in limited circumstances under our applicable policies.
- Be transparent about our privacy practices and how individuals can contact us with questions or concerns.
- Promptly report any actual or suspected unauthorized uses, disclosures or access to PII to your manager or to Integrity and Compliance.
- Never prohibit a student from reviewing his or her own academic records.
- Always ensure that third parties working with Adtalem are required to and do comply with our privacy policy requirements.
- Where you believe we are transferring or will transfer personal information from one country to another, contact Integrity and Compliance to be sure you understand applicable policies, laws and regulations



TO LEARN MORE

Contact Adtalem's Privacy Team
Adtalem's Privacy and FERPA Policies
Adtalem Global Education's Colleague Handbook, "Keep It Confidential" and "Protect Your Work" sections

neglecting his or her duty to protect the confidentiality of others. Similarly, you should never leave laptops or other electronic portable devices unattended, especially if they contain sensitive information. It takes only a few seconds for someone to do serious damage to your computer or your files or to access information on the computer, so take the time to lock your computer when you leave your desk.

Use Our Assets Wisely

We all have a responsibility to be efficient and economical in the use of resources and protect against the abuse of organizational assets to make sure they are used and cared for appropriately.

Adtalem assets include our buildings, equipment, vehicles, computers, phones, mobile devices, files, documents, inventory and supplies. Our assets also include intellectual property as well as our confidential and proprietary information.

Proper Use of Information Technology

Each of us must use Adtalem's electronic systems and resources in a manner that does not expose the organization to the risk of security breaches, legal claims, sabotage, computer viruses or similar problems.

Infrequent and incidental personal use of Adtalem electronic systems and resources is permitted as long as it does not interfere with your duties or your productivity and does not consume or divert resources that could otherwise be used for organizational purposes.

Always Keep in Mind

- Only use software that has been properly licensed. The copying or use of unlicensed or "pirated" software on Adtalem's electronic systems and resources is strictly prohibited.
- Report any suspected theft, embezzlement or misappropriation of any Adtalem property using the Speak Up HelpLine or HelpSite.
- Never sell, transfer, destroy or otherwise dispose of Adtalem assets or materials (including computers, equipment, and electronic and hard-copy records) without proper documentation and authorization.

Q&A

A report I found on the photocopier contains a lot of confidential personal records, including student identification numbers. I also often pass by computers where I can see confidential information on the screens. I do not want to get anyone into trouble, but I do not think it is right that this kind of information is left for all to see. What should I do?

You should immediately retrieve the document from the copier and deliver it to the document owner. If you don't know who the document owner is, contact your manager, your local HR representative or Integrity and Compliance for guidance. Protecting confidentiality and privacy is the responsibility of every colleague. When papers containing confidential information are left on the copier, the person who left them there is

**TO LEARN MORE**

Adtalem Global Education's Colleague Handbook, "Use Our Tools Responsibly" section

Maintain the Highest Standards of Academic Integrity

As a global provider of educational services, we are committed to providing our students with high-quality instruction and related services and support. In order to maintain this quality, we must uphold the highest standards of academic integrity.

Always Keep in Mind

- Use the work product of others in a proper manner and with proper authorization and/or citation.
- Forgo intentionally or knowingly helping or attempting to help another to commit any act of academic dishonesty.
- Maintain educational records and the academic standing of students properly.
- Refuse any offer of a bribe, gift or gratuity of any kind from any prospective or current student, and refrain from doing so on a prospective or current student's behalf.

**TO LEARN MORE**

In addition, student finance colleagues are also expected to adhere to the Student Finance Code of Conduct. For more information, contact Adtalem's Regulatory Compliance team.

Marketing, Advertisement, Recruitment and Admissions

The laws governing advertising and marketing activities are proscriptive. If you are involved in developing or using our marketing, advertising or promotional material, it is important that you understand the guidelines that relate to these activities. The same is true for any third parties creating such materials on our behalf.

We provide truthful, accurate and non-misleading information to prospective students, and we base admission solely on each applicant's ability to meet admission requirements, which vary by institution. We honor and properly document requests of students or other consumers not to be contacted by us via email, phone or other methods.

When recruiting prospective students, we provide responsible, objective and unbiased information. We are always truthful and never misleading, following



the tenets of Adtalem's Responsible Communications policy and training. We hold ourselves to these high standards not just because it is the law, but because it is the right thing to do to help our students achieve their educational and career goals.

As a provider of higher education, Adtalem is subject to extensive regulation. In order for Adtalem's degree-granting institutions and our students to remain eligible to participate in U.S. federal financial aid programs, we must abide by regulations that govern compensation for colleagues who recruit students.

Always Keep in Mind

Our Responsibilities to Our Partners and the Public

We want to be known as a trusted neighbor in the communities where we operate. We have a commitment to transparency and responsible business practices.

We always keep in mind our obligations to our shareholders, our business partners and the public, and we remain guided by our Values and our respect for the laws governing our operations everywhere we operate.

Serve the Greater Good

We are proud that as educators, the very nature of our work serves the greater good and makes a positive contribution to society and the lives of our students. As global citizens, we are committed to:

- Supporting social and educational initiatives in the communities in which we live and work
- Participating in relief efforts and service projects around the world
- Complying with the relevant environmental laws and regulations applicable in each country in which we operate
- Considering environmental responsibility as a factor in our decisions including recycling, conserving resources and working with our business partners
- Managing and minimizing our impact on the environment

- Comply with all applicable legal requirements and Adtalem policies and approval procedures when developing or implementing public relations, marketing, and advertising materials.
- Be sure all materials are truthful, complete, accurate, properly substantiated and not misleading.
- Provide supporting data and qualifying language when using statistics.
- Clearly state that the education offered is not a guarantee of employment or "success."



Build Lasting Business Relationships

We believe in working with business partners who share our commitment to high standards of ethics and integrity.

Our business partners – including our suppliers, vendors, representatives, and agents – represent us in the marketplace. If they act illegally or unethically, it can expose us to legal repercussions and/or damage our reputation.

Always Keep in Mind

- Make supplier-related decisions in the best interest of Adtalem and not for any personal benefit or gain.
- Be responsive to all reasonable requests from our business partners, but never do something that you regard as unlawful or contrary to laws, regulations, the Code or our policies.
- Respect the confidential information and intellectual property of others.
- Choose vendors and other third parties carefully, and never work with prohibited countries, organizations or persons.
- Watch for and report any signs that our business partners are violating applicable law or regulations.
- Be sure to follow Adtalem policies and procedures before you sign any contract with a third party for Adtalem or your institution.



TO LEARN MORE

Adtalem Global Education's Supply Management Policy
Adtalem Global Education's Vendor Code of Conduct
Adtalem Global Education's Colleague Handbook, "Authorization Required for Contracts and Agreements" section

Safeguard Confidential Information

When managed properly, our information can help us develop and administer quality educational programs and meet our objectives. When information is mismanaged, it puts our organization at risk.

Each of us must be vigilant and safeguard our confidential information as well as the confidential information that is entrusted to us by others such as our students. Depending on the situation, this can include strategic ideas, organizational plans, student records and other types of information gathered or generated as part of our operations and educational efforts.

We respect all patents, trademarks, copyrights, proprietary information and trade secrets, as well as the confidentiality of anyone with whom we do business.

Always Keep in Mind

- Use and disclose confidential information only for legitimate business purposes.
- Properly label confidential information to indicate how it should be handled, distributed and destroyed.

- Protect intellectual property and confidential information by sharing it only with authorized parties.
- Never discuss confidential information when others might be able to overhear what is being said – for example, on airplanes, in elevators or in other public places – and be careful not to send confidential information to unattended fax machines or printers.
- Follow all policies, procedures and retention schedules related to records and information management.
- Secure laptops, portable devices and storage media that may contain confidential or proprietary information, and follow all network and information-security policies and protocols.
- Report any potential data security breach to your manager, the senior manager of information governance or the chief information security officer.

Intellectual Property

We work hard to create and promote brands and educational programs that are recognized around the world. Our intellectual property, such as our copyrighted material and our trademarks, is a critical part of our identity and our operations; we must handle it responsibly and safeguard it.

Other examples of our intellectual property include:

- Logos
- Marketing and advertising materials
- Branding
- Course curricula
- Educational materials

If you are responsible for developing intellectual property, consult with your assigned Adtalem Legal representative.



TO LEARN MORE

Adtalem Global Education's Colleague Handbook, "Keep It Confidential" and "Protect Your Work" sections

Avoid Insider Trading

Some Adtalem colleagues may have access to information about the organization's finances or material, non-public information that might impact our economic future. We use material, non-public information in compliance with securities laws and do not trade in the securities of any public company – including Adtalem – when we are in possession of non-public, material or price-sensitive information.

"Material, non-public information" generally refers to any information that is not available to the public and that a reasonable investor would consider

important when deciding whether to buy, sell or hold a share. This can include news about acquisitions, financial results, important management changes, commencement or termination of major contracts as well as news about the financial, operational or environmental performance of an organization. It is important to know that material, non-public information can also be confidential information about another organization that you have obtained during the course of your work.

Always Keep in Mind

- Never use, for your own or others' benefit, any organization's information that has not been made public.
- Be careful when others request confidential information about Adtalem or our business partners. Even casual conversations could be viewed as illegal "tipping" of inside information.
- Never use material, non-public information to make investment decisions or to provide investment tips to family members, close relatives, friends or other third parties.
- Securities law violations are taken seriously and can be prosecuted even if the amount of money involved is small or when the "tipper" made no profit.



TO LEARN MORE

Adtalem Global Education's Insider Trading Policy

Keep Accurate Books and Records

We are committed to transparency and to making full, accurate, timely and understandable disclosure on all aspects of our organization, including financial reports that are filed with or submitted to regulatory authorities.

Colleagues with roles that involve the preparation of our public, financial and regulatory disclosures have special responsibility in this area, but all of us contribute to the process of recording organizational results and maintaining documents. Each of us is responsible for helping to ensure the information we record is accurate, complete and maintained in a manner consistent with our system of internal controls.

As a publicly held organization, we are required to report financial information in accordance with generally accepted accounting principles, and to maintain books and records that accurately and fairly reflect all transactions. This obligation, however, includes more than just financial information. Some examples include accurately recording enrollments, attendance, grades, communications, tuition, regulatory data and other essential organizational information.

Always Keep in Mind

- Fully comply with all laws, external accounting requirements and Adtalem policies and procedures for reporting financial and other organizational information.
- Never make false claims on an expense report or time sheet. • Be clear, concise, truthful and accurate when recording any information.
- Draft internal documents and communications as if they will be reviewed by third parties. Remember that our internal records are sometimes read by third parties and governmental agencies, so we should do our best to ensure that what we write will not be misinterpreted.
- Maintain all organizational records for legally required minimum periods and in accordance with Adtalem's records-retention procedures.
- Only destroy documents in accordance with the Adtalem records-retention policies and procedures, and be aware of special limitations or requirements that may be in place for records relating to potential or ongoing litigation, investigations or audits.
- Cooperate with Adtalem's internal and external auditors.

Q&A

At the end of the last quarter reporting period, my manager asked me to record additional expenses even though I had not received the invoices from the supplier and the work had not started. I agreed to do it, mostly because I did not think it really made a difference since we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing.

Costs must be recorded in the period in which they are incurred. The work was not started and the costs were not incurred by the date you recorded the transaction. It was therefore misleading and, depending on the circumstances, could be considered fraud. In such a situation, you should report the matter to your local HR representative or askHR, or use the Speak Up HelpSite or HelpLine.

Always Keep in Mind

- Colleagues must conduct business in accordance with fair trade practices and applicable fair competition and antitrust laws.
- Fair competition or antitrust laws are very complex and the risks of non-compliance can be severe. Contact with competitors should be limited and must always avoid certain subjects, including any matter relating to competition, such as markets, customers or prices. If such a conversation begins, leave the meeting immediately and report it to your Adtalem Legal representative or Integrity and Compliance.

Watch out for these Red Flags

Colleagues must not:

- Collude with other bidders ("bid rigging") in any tender, such as agreeing on who will be the successful bidder or the contract price.
- Collude with competitors to fix prices or to agree with a competitor not to do business with a supplier or a customer. • Illegally exchange with competitors sensitive information, such pricing, costs or other confidential proprietary information regarding Adtalem plans.
- Agree with a competitor to divide or carve up academic programs or calendars, or geographic markets or regions.
- Use a third party to pass information to a competitor.
- Engage in any other conduct which may violate any relevant competition or antitrust laws, rules or regulations in all relevant jurisdictions.

Compete Fairly

At Adtalem, we compete vigorously, but we do so fairly and honestly. It is critically important that we comply with antitrust and competition laws everywhere we operate.

Antitrust laws – also known as fair competition laws – regulate certain types of practices to ensure that consumers are given a choice in the marketplace, and that they are not subject to predatory or discriminatory practices. Violations of antitrust laws can carry severe fines and penalties.



Q&A

I received sensitive pricing information from one of our competitors. What should I do?

You should contact your manager and your Adtalem Legal representative before taking any further action. It is important that from the moment we receive such information, we demonstrate respect for antitrust laws and make clear that we expect others to do the same. This requires appropriate action that can be decided only on a case-by-case basis.

I am planning to attend a trade show. Are there any special precautions I should take to avoid a potential antitrust problem?

Trade association meetings and other industry gatherings typically serve perfectly legitimate and worthwhile purposes. However, these meetings also provide a potential pitfall under competition and

antitrust laws because they bring together competitors who may be prone to discussing matters of mutual concern. You must be especially careful to avoid discussions or exchanges of information relating to competitive matters. If competitors are discussing these matters, you should excuse yourself.

Gathering Business Intelligence

When collecting business intelligence, colleagues and others who are working on our behalf must always abide by the highest ethical standards. Never engage in fraud, misrepresentation or deception to obtain information or use invasive technology to spy on others. Be careful when accepting information from third parties, and be sure that the knowledge they provide is not protected by trade secret laws or non-disclosure or confidentiality agreements.

When gathering information on a competitor, you must never:

- Seek out confidential information of a competitor or someone outside the organization.

- Purchase confidential information related to a competitor.
- Use confidential information obtained inadvertently or accidentally.
- Request to see confidential bids submitted by competitors.
- Invest in a competitor to gain access to confidential information.

While we may employ former colleagues of competitors, we always recognize and respect the obligations of those colleagues not to use or disclose the confidential information of their former employers.

Avoid and Disclose Conflicts of Interest

A conflict of interest exists when your private interest interferes in any way – or even appears to interfere – with the interests of Adtalem and its institutions or companies. A conflict of interest may also exist when your interests or activities affect, or appear to affect your ability to make objective decisions for Adtalem and/or any of its institutions or companies. You are expected to use good judgment and avoid situations involving conflicts of interest, which can undermine the trust that others place in us and damage our reputation.

Conflicts of interest are not always clear. If you have a question, talk to your manager or to Integrity and Compliance. Even if you only think a conflict of interest might exist, you should disclose the situation to Integrity and Compliance so that they may properly evaluate, monitor and manage the situation.

Always Keep in Mind

- Always make business decisions in the best interest of Adtalem, its institutions and companies.

- Disclose to Integrity and Compliance any relationship, outside activity, financial interest or other situation that may present a possible conflict of interest or the appearance of a conflict of interest.
- Proactively address situations where you or a family member's financial interests may conflict with Adtalem's best interests.

The following are common examples of potential conflicts of interest; these and others may also be described in local Adtalem policies.

Business Opportunities

If you learn about a business opportunity because of your role with Adtalem or any of its institutions or companies, that opportunity belongs to Adtalem and/or the institution or company. Colleagues may not take for themselves, or direct to any third party, opportunities that are discovered as a result of their role with Adtalem.

Personal Relationships

Engaging in or maintaining inappropriate personal relationships with fellow colleagues, or with prospective or current students, may create a conflict of interest. Examples of personal relationships that may lead to conflicts of interest include family relationships and romantic/intimate relationships. Personal relationships that interfere with your ability to objectively perform your role should be avoided, but should be disclosed if they do occur. (See the "Appropriate Relationships" section of this Code for more details.)

Outside Employment

We do not prohibit colleagues from engaging in all outside employment. However, certain activity may involve a conflict of interest and should be disclosed and approved by Integrity and Compliance.

Some examples include:

- Any outside employment that affects your job performance.
- Employment of any kind (including consulting or faculty positions) with a competitor, supplier or customer. (Some exceptions may exist for faculty members. Contact your head of academic affairs for more information).

Personal Investments

Colleagues are not permitted to have a substantial ownership interest in any organization that may or does work with Adtalem. This rule applies to direct and indirect ownership.

A "substantial ownership interest" is an ownership interest of greater than 5 percent of total net worth of the colleague and immediate family members, or greater than 1 percent of the outstanding equity securities of a public company. There are exceptions to this rule for investments that are made

through mutual funds or managed accounts where you do not make specific investment decisions.

Civic Activities

Colleagues may be invited to serve as members of boards of directors, advisory boards or committees related to another organization. Approval may be granted if the outside organization does not compete with Adtalem and if the obligations to serve can be met on your own time. In all such cases, the civic activity should be disclosed to your manager and to Integrity and Compliance.

Circumstances can change and new conflicts can surface over time, which is why it is important to reassess your situation from time to time and discuss any potential conflicts with your manager and Integrity and Compliance.

Exchange Only Appropriate Gifts and Entertainment

When handled properly, appropriate and reasonable gifts and entertainment can strengthen business relationships. But when abused, they can damage our reputation, harm our business and may even be illegal.

Gifts and entertainment may only be exchanged if they are reasonable complements to business relationships, are consistent with Adtalem's policies, are legal and are acceptable under the policies of the recipient's organization.

Always Keep in Mind

- Only provide and accept gifts and entertainment that are reasonable complements to business relationships.
- Do not solicit personal gifts, favors, entertainment or services.
- With the exception of nominal expressions of gratitude such as a thank-you card or flowers, colleagues should never accept a gift from a current or prospective student.
- Faculty and students may wish to assemble to celebrate the end of a semester or other academic achievement. Such events are permitted, provided that:
 - The event adheres to the institution's Values.— Students do not purchase food, beverages or alcohol for faculty members.
 - The event conforms to the expectations set forth in the "Appropriate Relationships" and "Safety and Security" sections of this Code.



- Personal gifts or entertainment exchanged between colleagues are not subject to the Gifts and Entertainment policy. However, these items should never be charged as a business expense or otherwise purchased with Adtalem resources.

Types of Gifts and Entertainment That are Never Allowed

The following examples of prohibited gifts and entertainment apply to colleagues, students and third parties.

- Gifts or entertainment that are lavish or frequent.
- Gifts or entertainment from a source of student lending.
- Cash or securities, such as stocks or bonds.
- Gifts or entertainment that are sexually oriented.
- Any gift or entertainment that amounts to a quid pro quo (i.e., I will give you this if you give me that).
- Entertainment or events that do not include a business-related benefit or educational component, including non-business-related events involving travel and lodging that are covered by a third party.

In addition, colleagues who are responsible for recruitment, admissions or financial aid advising activities must never accept a gift or entertainment of any value.

Gifts and Entertainment of Government Representatives

We should never directly or indirectly offer, promise or grant anything of value to a government representative to influence any business decision or to obtain improper advantage.

Always make sure that you know whether you are dealing with a government representative or government-related entity. This is not always obvious. Businesses such as airlines, oil companies, hospitals, colleges, universities, K-12 schools and telecommunications providers may be owned or controlled by a government. When in doubt, discuss the situation with your Adtalem Legal representative or Integrity and Compliance.



TO LEARN MORE

If you ever have questions about whether or not a gift or entertainment is acceptable, discuss the matter with your manager or contact Integrity and Compliance. Adtalem's Gifts & Entertainment Policy; Adtalem's Anti-Bribery and Anti-Corruption Policy
Adtalem Global Education's Colleague Handbook, "Gift Restrictions" section

Engage in Responsible Public Communications

Adtalem is a publicly held organization and a member of the New York Stock Exchange.

Therefore, it is common for Adtalem to receive inquiries from the investment community, government agencies and the media on a variety of topics. Due to the sensitive nature of our information, as well as securities laws and other laws related to disclosure of information, we must closely manage when and how we share our information and communicate with the investment community, the government and the media. Only authorized persons may speak with, reply to or send information to the media, government or members of the investment community on behalf of Adtalem.

Inquiries from the investment community and media should be handled only by colleagues who are expressly authorized to handle such inquiries. All media or investment inquiries received by Adtalem or one of its institutions should be forwarded to the public relations, communications or media affairs representative within the institution.

Always Keep in Mind

- Public communications include social media platforms. You may use social media platforms for organizational reasons only when you are expressly authorized to do so by Adtalem or one of its institutions.
- Conferences and external presentations are an excellent way to share our expertise with others, but they should be reviewed by management and may need to be reviewed in advance by Regulatory Affairs. Submit presentations via email to responsiblecommunications@adtalem.com.

Social Media

- There are a limited number of colleagues who are authorized to respond or otherwise speak on behalf of Adtalem, and those who do so should use only Adtalem-managed social media outlets for that purpose.
- If you read an online comment about Adtalem that you believe is wrong, do not respond. Adtalem's External Relations department regularly monitors external content and will respond appropriately.
- Be thoughtful in all your communications online, including through social media. Never harass or post discriminatory comments (as defined by our anti-harassment/ anti-discrimination policies), or threaten fellow colleagues, students or anyone else. Harassing, threatening or similarly inappropriate conduct that violates Adtalem's policies is discouraged in general and is never allowed while using Adtalem equipment or during your working time.
- Personally managed social media outlets or websites may not be used to advertise, promote, recruit for or support the business of Adtalem in any way.



TO LEARN MORE

For more information, or when in doubt, contact a senior member of Adtalem's Global Communications or Investor Relations team. Adtalem's Anti-Harassment & Non-Discrimination Policy. Adtalem's Policy Against Harassment, Discrimination and Retaliation (CALIFORNIA COLLEAGUES)

Our Responsibilities as an International Organization

We work together with governments and local communities and do our part as a responsible international organization to contribute to sustainable growth while providing employment to colleagues and creating opportunities for our students and others.

Avoid Corruption and Bribery

Adtalem has a zero-tolerance policy toward bribery and corruption. Bribery and corruption in all forms are completely contrary to our Values, the Code and our policies.

We comply with the Foreign Corrupt Practices Act (FCPA) and all other global laws and regulations which prohibit corruption and bribery internationally, and we support efforts to eliminate bribery and corruption worldwide. We work hard to make sure that our business partners share our commitment.

Colleagues and third parties acting on our behalf are not permitted to promise or provide anything of value to a colleague or a government official for the purpose of gaining an unfair advantage.

Likewise, colleagues and our third parties are also prohibited from receiving bribes from any third party for the purposes of gaining an unfair advantage.

Bribery is a crime in the countries where Adtalem, our institutions and companies operate, and penalties can be severe. If you have questions or concerns, discuss them with your Adtalem Legal representative or Integrity and Compliance.

Always Keep in Mind

- Do not offer or accept bribes or any other kind of improper payment, including facilitation payments.

- Keep accurate books and records so that payments are correctly described and Adtalem funds are not used for unlawful purposes.
- Know who you are doing business with and confirm that appropriate due diligence has been conducted on third parties.
- Never do anything through a third party that you are not allowed to do yourself.



TO LEARN MORE

Adtalem Global Education's Colleague Handbook, "Gift Restrictions" section
Adtalem Global Education's Anti-Bribery & Anti-Corruption Policy

However, there are strict and complex regulations governing political activity. For this reason, you should be careful when involved in political activities and understand your responsibilities to Adtalem Global Education. Lobbying activities for or on behalf of Adtalem Global Education may be conducted only by or at the express, written direction of the Government Relations organization.

Always Keep in Mind

- You may be involved in lobbying if you:

Q&A

I have questions about the use of third parties who may be go-betweens helping us with local government authorities. What should I do to make sure that they do not get us into trouble?

You are right to be concerned. Control over agents and other third parties who are operating on Adtalem's behalf is important. We should ensure that their reputations, backgrounds and abilities are appropriate and meet our ethical standards. Agents and third parties are expected to act in accordance with the requirements set out in this Code. You should never do anything through a third party that you are not allowed to do yourself.

Sometimes when I am traveling, I see practices that I would consider inappropriate, but they are common practices in the country I am visiting. What should I do if I am asked to provide what I consider to be a bribe but what the locals think of as a common business courtesy?

You should decline and inform the person that your organization's policies prohibit you from making such payments. Remember: No matter where you are, our policies apply. You should never provide a payment or anything of value to gain an improper business advantage.

Engage With Care in Political Involvement

We respect the right of colleagues to participate voluntarily in the political process, including making their own personal political contributions and expressing their personal political views.

- Communicate in any way with legislators, regulators or other government officials in any way. - Attempt to influence legislative or regulatory action. - Provide gifts or entertainment to legislators, regulators or other government officials.
- Political donations, including donations to politicians, campaigns, trade groups or associations, and political parties, on behalf of Adtalem and its institutions may be made only by or at the express, written direction of the Government Relations organization.
- Receive all necessary approvals in writing before using any Adtalem, institution or company resources to support lobbying or other political activities.
- Make sure that your personal political views and activities are not viewed as representing Adtalem.
- Seek guidance from the Government Relations organization before providing any gifts or entertainment to public officials or hosting an event that will be attended by public officials.

See also the “Gifts and Entertainment of Government Representatives” section of this Code.

- Do not use Adtalem resources or facilities to support your personal political activities.

Watch Out For These Red Flags

- Never apply direct or indirect pressure to another colleague to contribute to, support or oppose any political candidate or party.
- Avoid even the appearance that you are making political or charitable contributions in order to gain favor or to exert improper influence.
- Holding or campaigning for political office might create a conflict of interest. Be sure to disclose such activities to your manager or a senior member of the Government Relations team.



TO LEARN MORE

Discuss any questions or concerns about personal political contributions or political activities with your manager or Adtalem's Government Relations organization. If you need more information you should review Adtalem Global Education's Colleague Handbook, “No Solicitation Policy” section.

Operate Globally with Integrity

We must always operate with transparency and comply with all laws governing global trade.

The laws governing trade across international borders, including imports and exports and the transfer of technology, are extensive and complicated. The sanctions for violating these laws can be severe, up to and including substantial fines and/or imprisonment.

Always Keep in Mind



Adtalem colleagues and third parties acting on our behalf are expected to:

- Follow all applicable trade laws and regulations in the countries where we operate.
- Consult with your Adtalem Legal or Integrity and Compliance representative before transferring goods, equipment, data or technology of any kind across borders or to individuals from other countries, even if they are in the U.S.
- Never engage in any financial transactions that promote or result from criminal activity.
- Be alert to efforts to receive, transfer, transport, retain, use, divert or hide the proceeds of any criminal activity.
- Report any suspicions that such criminal conduct has occurred to Integrity and Compliance or your Adtalem Legal representative.

Q&A

I will be attending a fundraiser for a candidate for local office. Is it acceptable to list my position at Adtalem on the attendee list and in the program as long as I don't use any organization funds or resources?

In some jurisdictions, you may be required to list your employer when making a personal political contribution, including when you attend fundraising events. However, apart from such legal requirements, you should make it clear that your personal political activities are distinct from those of Adtalem.

I would like to invite an elected official to speak at an upcoming Adtalem event. Would that be a problem?

You should get approval from Government

Relations before inviting an elected official to attend a Adtalem event. Laws governing contributions are complex, and in some jurisdictions if the invitee is in the midst of a re-election campaign, the organization's event could be viewed as support for the campaign and the food and drink at the event may be considered gifts. In most instances, there will be limits and reporting obligations that should be carefully followed.

Retaliation

Adtalem prohibits any form of retaliation, including, but not limited to, retaliatory discipline, acts of reprisal, or any form of intimidation for a colleague's reporting or participating in a related investigation of conduct that potentially or actually violates this Code.

