

Walden University



**2025-2026 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 15, 2025

The policies outlined in this document are current as of September 15, 2025. The most current versions of the policies are available online.

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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

WALDEN UNIVERSITY TITLE IX GRIEVANCE REPORTING POLICY AND PROCEDURES

The United States Department of Education (DOE) mandates that institutions comply with specific requirements under Title IX of the Educational Amendments of 1972. Title IX is a federal civil rights law that prohibits discrimination on the basis of sex in education programs or activities. Title IX extends to admissions and employment. Walden University (“Walden” or the “University”) is committed to providing a safe educational and working environment for its students, faculty, staff, and other members of the university community. Walden prohibits all forms of discrimination based upon sex, which are forms of misconduct that undermine the integrity of the academic environment. All members of the University community, especially officers, faculty members, and other individuals who exercise supervisory authority, have an obligation to promote an environment that is free of discrimination based on sex. It should be noted that while Walden prohibits sexually violent acts, which can be considered criminal offenses, Walden aims to protect students from conduct that may not rise to the criminal level and therefore may use different standards and definitions in this Policy than state criminal codes.

Walden prohibits discrimination based upon sex in all of its education programs and activities. This includes classes, online fora, residencies, and student-sponsored groups. Recognizing that some students may participate in educational activities outside of Walden’s specific programs (for example, field experiences), this policy does not apply where Walden does not exercise substantial control over both the Respondent (as hereinafter defined) and the context in which the discrimination occurred. However, other policies may continue to apply and students who experience discrimination in outside programs are nevertheless encouraged to alert Walden to any discrimination in connection with those programs.

1. Definitions

Complainant: The Complainant is an individual who is alleged to be the recipient of conduct that could be considered Sexual Harassment under this Policy.

Consent: Consent is an affirmative decision to engage in mutually acceptable sexual activity given by clearly and mutually understandable words or actions that create a knowing, willing, voluntary, and active agreement by all parties regarding the conditions of sexual activity. The Consent must be present and ongoing. Consent is active, not passive. Silence or an absence of resistance cannot be interpreted as Consent. Consent to engage in sexual activity with one person does not imply Consent to engage in sexual activity with another. Consent to sexual activity may be withdrawn at any time provided that the withdrawal of Consent is communicated in clearly understandable words or actions. If Consent is withdrawn, all sexual activity must immediately cease.

In the absence of mutually understandable words or actions (an agreement on what is to be done, where, with whom, when, and how), it is the responsibility of the initiator (the person who wants to engage in the specific sexual activity) to make sure that he or she has Consent from the potential partner(s). Coercion, force, or threat of either invalidates Consent.

Someone is not giving Consent if they are: saying “no” or “stop”, crying, moving away, pushing the other(s) away, unengaged, incapacitated (including incapacitation due to intoxication), asleep, unconscious, physically or psychologically pressured or forced, intimidated, coerced, manipulated, has a mental or physical impairment that would raise doubt about the capacity to give Consent, beaten, threatened, or confined.

Furthermore, a current or previous dating or sexual relationship is not sufficient to constitute Consent. Consent to one form of sexual activity does not imply Consent to other forms of sexual activity. Being intoxicated does not diminish one’s responsibility to obtain Consent. Being intoxicated does not invalidate consent, although one who is incapacitated due to intoxication cannot give Consent. Silence, previous sexual relationships, and/or a current relationship with the initiator (or anyone else) do not, standing alone, constitute Consent.

Respondent: The Respondent is the reported perpetrator of conduct that could constitute Sexual Harassment under this Policy.

Sexual Assault: Consistent with the definition of a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation, Sexual Assault means any actual, attempted, or threatened sexual act or sexual contact with another person without that person’s Consent. Sexual Assault includes but is not limited to rape and attempted rape and any other acts using force, violence, threat, intimidation, or coercion, or use of duress or deception upon the victim, or taking advantage of a victim’s inability to make reasoned decisions about sexual activity. This includes:

1. *Non-Consensual Sexual Intercourse or Rape:* Non-consensual sexual intercourse or rape is any sexual intercourse, however slight, with any object, by one person upon another, which is without Consent and/or by force, or any attempt to commit same. It includes vaginal penetration by a penis, object, tongue or finger, anal penetration by a penis, object, tongue, or finger, and oral copulation (mouth to genital contact or genital to mouth contact), no matter how slight the penetration or contact.

2. *Non-Consensual Sexual Contact*: Non-consensual sexual contact is any intentional and unwelcome sexual touching, however slight, with any object by a person upon another person that is without Consent and/or by force, threat or intimidation, or attempts to commit same. It includes intentional and unwelcome contact with the genitals, breasts, thighs, buttocks, anus, or groin, touching another with any of these body parts, or making another touch you or themselves with or on any of these body parts, and any intentional bodily contact in a sexual manner, though not involving contact with/of/by genitals, breasts, thighs, buttock, anus, groin, mouth or other orifice.

3. *Dating Violence*: Dating Violence is violence committed by a person (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors: (i) the length of the relationship; (ii) the type of relationship; and (iii) the frequency of interaction between the persons involved in the relationship.

4. *Domestic Violence*: Domestic Violence includes felony or misdemeanor crimes 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 receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

5. *Stalking*: Stalking means engaging in a course of conduct directed at a specific person that would cause a reasonable person to (A) fear for his or her safety or the safety of others; or (B) suffer substantial emotional distress.

Sexual Harassment: Sexual harassment is unwelcome conduct that a reasonable person would determine is so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the school's education program or activity, such as 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. In determining whether Sexual Harassment has occurred in an academic environment, Walden takes into account considerations relating to academic discourse, freedom and expression.

Regardless of its severity, Sexual Harassment includes any instance of Sexual Assault or any *quid pro quo* harassment by a school employee when submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's employment or participation in an educational program or is used as a basis for decisions affecting employment or academic progress.

Supportive Measures: Supportive Measures are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without cost. They are meant to restore or preserve equal access to Walden's educational program or

activity without unreasonably burdening the other party. Supportive Measures could include, for example, counseling, extensions of deadlines or other course-related adjustments, modifications of schedules, leaves of absence, escort services or other similar measures.

2. Procedural Overview

Reporting Procedures

Any person who wishes to report Sexual Harassment or discrimination against a Walden student or employee must report the incident to a Walden Title IX Coordinator to initiate the complaint process. The Title IX Coordinators are responsible for receiving and promptly responding to reports concerning Sexual Harassment in violation of Title IX. Any questions or complaints regarding Title IX may also be directed to the Title IX Coordinator or to the Assistant Secretary for Civil Rights of the U.S. Department of Education. Students, faculty, or staff members who feel they are the victim of a crime have the right to file both a criminal complaint and a Title IX complaint simultaneously.

Any complaint involving a student must be reported to the Title IX Coordinator, Title IX Deputy Coordinator, or Title IX Deputy Coordinator, Academic Residencies. Complaints involving only faculty and staff must be reported to the Title IX Deputy Coordinator, Human Resources. Throughout this Policy, the term Title IX Coordinator includes the Title IX Deputy Coordinators.

Walden University's Title IX Coordinators

Title IX Coordinator (Lead)

Gina Dyson, Associate Dean, Student Affairs
100 S Washington Ave #1210, Minneapolis, MN 55401
Phone: 443-220-7016
E-mail: TitleIX@mail.waldenu.edu

Title IX Deputy Coordinator

Julie K. Ogren, Director, Student Organizations and Planning 100 S
Washington Ave #1210, Minneapolis, MN 55401
Phone: 410-525-4341
E-mail: TitleIX@mail.waldenu.edu

Title IX Deputy Coordinator, Academic Residencies Maranda Griffin,

Senior Director Academic Residencies 100 S Washington Ave #1210,
Minneapolis, MN 55401
Phone: 952-444-9079 ext. 2979079
E-mail: TitleIX@mail.waldenu.edu

Title IX Deputy Coordinator, Human Resources Danielle Marsh,

Executive Director, Human Resources 100 S Washington Ave
#1210, Minneapolis, MN 55401
Phone: 443-537-1736
E-mail: TitleIX@mail.waldenu.edu

3. Investigative Process

The following steps will be taken by the Title IX Coordinator in the event of a complaint of Sexual Harassment:

Step 1: Intake/Reporting of Complaint

When a report is made by someone other than the Complainant, the Title IX Coordinator will contact the alleged victim, if known, to determine if that individual desires to make a Complainant whether an investigation otherwise should be opened.

When a report is made by a Complainant, the Title IX Coordinator will confidentially discuss the availability of Supportive Measures, explain to the Complainant the process for filing a formal complaint and inform the Complainant that Supportive Measures are available without filing a formal complaint. If a report is made by a person other than the Complainant, the Title IX Coordinator (or Deputy) will contact the alleged victim to discuss these matters.

If the Title IX Coordinator determines that the allegations, on their face, do not meet the definition of Sexual Harassment under this Policy, or did not occur in the school's education program or activities, the Title IX Coordinator will not pursue the procedures under this Policy but may refer the matter for resolution under the Code of Conduct, Faculty Handbook, Employee Handbook, or any other appropriate policy.

Step 2: Determination of Supportive Measures

Upon notification of a concern of Sexual Harassment, Walden University shall take steps to ensure equal access to its education programs and activities for the person alleged to be the victim. The Title IX Coordinator shall work with the Complainant and Respondent to determine what, if any, Supportive Measures shall be implemented. Supportive Measures shall be considered and implemented, if appropriate, regardless of whether the Complainant files a formal complaint.

Step 3: Filing of Formal Complaint

A Complainant will be notified of his or her right to file a formal complaint under this Policy. A Complainant may decline to do so. Walden University supports the Complainant's right to request confidentiality in cases involving Sexual Harassment. Complainants have the right to ask that their names not be disclosed to the Respondent (if not filing a formal complaint). However, there are some situations in which the University must override a Complainant's request for confidentiality in order to meet the institution's legal obligations under Title IX or other laws. In these situations, Walden will only share the information with individuals who are responsible for handling Walden University's response to incidents of sexual violence and those necessary to carry out the Title IX proceeding or otherwise with a need to know consistent with the purposes of Title IX. Given the sensitive nature of reports of Sexual Harassment, Walden University shall ensure that the information is maintained in a secure manner. If the Complainant does not wish to file a formal complaint, requests that his or her name not be revealed to the Respondent or if Complainant asks Walden University not to investigate or seek action against the Respondent, Walden University will be limited in its ability to respond fully

to the incident, including taking disciplinary action against the alleged perpetrator. If the Complainant still requests that his or her name not be disclosed to the Respondent, or that Walden University not investigate or seek action against the Respondent, Walden will need to determine whether or not the institution can honor such a request while providing a safe and nondiscriminatory environment for all students, faculty, and staff. Walden will keep confidential the identity of the Complainant, Respondent, and witnesses, except as required by FERPA or other law, or as necessary to carry out a Title IX proceeding.

If the Complainant wishes to move forward with the process and file a formal Title IX complaint, they will be asked a series of questions to provide further information relating to the matter. A formal complaint may be filed in person, by mail or by electronic mail. If the Complainant prefers, they may provide the information requested in the Sexual Harassment Complaint Report Form and submit it to the Title IX Coordinator. The form is available from the Title IX Coordinator or by downloading from the Walden Title IX page on the WaldenU.edu website. To file a formal complaint, the Complainant must be a current participant in Walden's educational programs or attempting to participate in an educational program or activity. If the Complainant does not want to file a formal complaint, they will be offered Supportive Measures but no investigation or informal resolution will be undertaken, unless Walden determines that it must pursue a formal complaint signed by the Title IX Coordinator in order to meet its obligations to respond promptly in a manner that is not deliberately indifferent and provide a safe and nondiscriminatory environment for all students, faculty and staff.

Step 4: Notice to Complainant and Respondent

Promptly after Walden has determined that a formal complaint has been filed and an investigation is to be undertaken, the Complainant and Respondent will be notified that a complaint has been received by the University and will be investigated under this Policy. The Notice will be in writing and will contain the allegations potentially constituting Sexual Harassment, including sufficient details known by the University at the time. Specifically, the Notice will include:

1. The identities of the parties involved in the incident, if known;
2. The date and location of the alleged incident, if known;
3. A statement that the Respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility is made at the conclusion of the Title IX process;
4. That the parties may have an advisor of their choice, who may be, but is not required to be, an attorney;
5. That the parties may inspect and review evidence; and
6. That the University's Code of Conduct prohibits students from knowingly making false statements and knowingly submitting false information during the Title IX process.

In addition, the Notice to Respondent shall provide Respondent with sufficient time to prepare a response before any initial interview.

Step 5: Consideration of Informal Resolution

The Title IX Coordinator shall consider whether informal resolution would be appropriate based upon the allegations of the formal complaint and the individuals involved. Informal resolution may include mediation, restorative justice, or other informal means of resolving the complaint. Informal resolution is not appropriate where the allegations involve Sexual Harassment of a student by an employee. If the Title IX Coordinator believes that informal resolution is appropriate, the Title IX Coordinator shall offer informal resolution to both parties.

If both parties provide voluntary, informed, written consent to attempt informal resolution, the Title IX Coordinator will facilitate that process as appropriate. Either party may choose to withdraw from the informal resolution process at any time. If informal resolution cannot resolve the matter to the satisfaction of both parties, the Title IX Coordinator will begin the investigation process.

Step 6: Initiate Investigation Process.

The Title IX Coordinator shall determine, given the circumstances surrounding the complaint, who shall conduct the investigation. The investigator may or may not be the Title IX Coordinator, but shall be a person able to conduct an impartial and fair review of the complaint, will have received proper training on the definition of “Sexual Harassment,” and will in no circumstances have a conflict of interest. The fact-finding investigation includes an objective evaluation of all relevant evidence, both inculpatory and exculpatory. During the investigation and until a determination is made, there is a presumption that the Respondent is not responsible for the alleged conduct.

The role of the investigator is to gather and synthesize relevant information in a report that will be provided to the Hearing Officer. The parties may submit information to the investigator that they believe to be relevant. The investigator has the discretion to determine the relevance of any witness or other evidence and may exclude information in preparing the investigation report if the information is irrelevant, immaterial, or more prejudicial than informative. The investigation may but will not necessarily include interviews of the Complainant, the Respondent, and any witnesses; reviewing law enforcement investigation documents (if applicable); reviewing student and personnel files; gathering and examining medical records and other relevant documents or evidence; and any other efforts the investigator believes are necessary to the fact-finding process. Walden University shall promote a fair investigation process that provides the same opportunities to all parties. An individual’s character or reputation with respect to other sexual activity is not relevant and will not be considered as evidence or included in the investigator’s report. Similarly, an individual’s prior or subsequent sexual activity is typically not relevant and will only be considered as evidence and included in the investigator’s report under limited circumstances. For example, prior sexual history may be relevant to explain the presence of a physical injury or to help resolve other questions raised by the report. The investigator will determine the relevance of this information and both parties will be informed if evidence of prior sexual history is deemed relevant. Both parties will have the opportunity to review and respond to any relevant evidence

and to provide inculpatory and exculpatory material. The investigator will send written notice of any investigative interviews or meetings to a party whose attendance is invited or expected.

At the conclusion of the investigation, the investigator will prepare a draft investigative report that fairly summarizes the relevant evidence. The investigator will not make a finding or recommended finding of responsibility. The investigator's report may include credibility assessments based on the investigator's experience with the Complainant, Respondent, and witnesses, as well as the evidence. However, credibility determinations may not be based on a person's status as a Complainant, Respondent, or witness. Copies of the draft report will be sent to the parties and their advisors, and evidence directly related to the allegations will be made available, with at least ten (10) days for the parties to inspect, review and respond to the evidence prior to the issuance of a final written investigative report. Responses to the investigative report must be provided to the Title IX Coordinator with a copy to the opposing party. If neither party responds, the investigative report is considered to be final. If one or both parties respond to the investigative report, the Title IX Coordinator will determine whether any modifications are required. After making any such modifications, the investigative report is final and the Title IX Coordinator will provide a copy of the final report to both parties and their advisors at least ten (10) days prior to a hearing. No response to the final report will be permitted. The Complainant and Respondent and their advisors may only share the draft or final investigative report for the purpose of receiving counsel or advice related to the Title IX process.

If, at the conclusion of the investigation process, the Title IX Coordinator determines that the allegations do not meet the definition of Sexual Harassment or that the conduct did not occur in Walden's educational programs or activities, the Title IX Coordinator shall dismiss the complaint and will provide both parties with written notice of the dismissal and the reason for the dismissal. If, at the conclusion of the investigation, the Title IX Coordinator determines that the allegations, if proven, would support a finding of Sexual Harassment, the Title IX Coordinator shall provide a copy of the written report to an individual designated to be the Hearing Officer, which shall begin the hearing phase of the process.

Step 7: Hearing

Walden will make arrangements for a Hearing Officer to conduct a live hearing by videoconference to determine whether a violation of this Policy occurred and, if so, the appropriate sanction or discipline. A "live" hearing may include a virtual hearing conducted completely by videoconference. The hearing will be presided over by a single Hearing Officer appointed by the Title IX Coordinator. The appointed Hearing Officer will be a College or School Vice Provost, unless the Respondent is an employee of Walden University, in which case the Hearing Officer will be a Human Resources Director, or their designee, who may be an independent third party. At the hearing, the Complainant will first provide evidence in support of the complaint. The Respondent will then provide evidence in their defense. Both parties shall have the right to call witnesses and introduce evidence in support of their case. Each party's advisor will be permitted to ask relevant questions of the other party and any witnesses. At no time shall a party be permitted to directly ask questions to another party. Before any witness answers a question, the Hearing Officer shall determine whether any question is not relevant. Questions related to a Complainant's prior sexual history are not relevant unless offered to prove

Consent or that someone other than the Respondent committed the alleged misconduct. If either party does not have an advisor present at a hearing, Walden will provide one to conduct cross-examination of the other party. The rules of evidence do not apply to hearings under this Policy, but Walden will observe and respect legal privileges against the disclosure of communications, such as the attorney-client privilege.

At the request of either party, Walden will provide for the live hearing to occur with the parties located in separate videoconferencing rooms with technology enabling the Hearing Officer and parties to simultaneously see and hear the party or the witness answering questions. Walden will create an audio, audiovisual, or transcript recording of the hearing.

Step 8: Rendering of a Decision

Upon the completion of the hearing, the Hearing Officer shall determine the appropriate resolution to the complaint, and, if substantiated, any disciplinary action against the Respondent, which could include, for students: discipline, suspension, or expulsion; and, for employees could include: discipline, suspension or termination of employment. The Hearing Officer will also determine any remedies for the Complainant, such as reassignment of a course section or residency, counseling services, as well as changes to the school's overall services or policies. Any remedies offered would be separate from, and in addition to, any Supportive Measure that may have been provided prior to the conclusion of the investigation. The Hearing Officer will issue a written determination on the formal complaint, which will include findings of fact, conclusions about whether the alleged conduct occurred, rationale for the result as to each allegation, any discipline imposed on the Respondent, and whether remedies will be provided to the Complainant. The written determination will be issued simultaneously to the parties, along with information about how to file an appeal.

Step 9: Notification of Findings

Walden University shall provide simultaneous written notification to the Complainant and the Respondent of the findings of the investigation within substantially the same timeframe, along with information about how to file an appeal.

Step 10: Appeals

- **Eligibility and Timeframe.** Either party may appeal a decision under this Policy. Appeals must be submitted in writing within ten (10) calendar days of notification of the decision. Student appeals will be decided by the Chief Academic Officer, and faculty or staff member appeals will be decided by the Vice President Human Resources. The administrator authorized in this section to decide the appeal is referred to in this Policy as the "Appeals Official."
- **Grounds.** There is a presumption that the decision and any sanction or discipline were made properly, and the sole grounds for appeal that will be considered are: (1) A procedural error that affected the final decision; (2) Previously unavailable, substantive, and relevant information that could

materially impact the final decision; (3) the discovery that Title IX personnel had a conflict of interest or bias; and/or (4) the sanction or discipline imposed is substantially disproportionate for the facts of the case or the violation that was found to have occurred. The burden of proof during the appeal is on the party appealing.

- **Notice.** Upon receipt of the appeal, the Appeals Official shall notify the other party, in writing, informing that party of their right to respond, and shall provide a copy of the appeal to the other party. The non-appealing party may submit a written response to the appeal within ten (10) calendar days from the date they are notified of the appeal.
- **Decision.** The Appeals Official will review the written decision and any responses made by the parties, and may exercise the discretion to request further information or documents from the parties and/or the person who issued the original decision and/or to speak with the parties. If the Appeals Official elects to speak with the Complainant or Respondent, a conversation will be held with each separately. The parties' advisors may be present during any such conversations.
- **Final Determination.** The decision of the Appeals Official shall be Walden University's final determination regarding the decision and the sanction. There are no further appeals. The Appeals Official will provide the Complainant and the Respondent with written notification of the outcome of the appeal. which will be given at the same time and delivered in the same manner. This notification will include (1) whether the original decision was changed or upheld, and (2) if the original decision was changed, a description of the change(s) and the reason(s) for the change(s).

4. Other Information

Advisors

Complainants and Respondents are entitled to be accompanied and assisted by an advisor of their choosing at both formal and informal meetings, investigation interviews, and hearings. Except at a hearing, where advisors will conduct cross-examination on behalf of each party, advisors may not participate in the process or speak on behalf of the Complainant or Respondent. Complainants and Respondents may choose to have an attorney serve as their advisor but accommodations, including scheduling of interviews or hearings, will not be made for any advisors, including attorneys, if they unduly delay the process.

Evidentiary Standard

In investigating a formal complaint under this Policy, Walden University shall use a *preponderance of the evidence* (more likely than not) standard when considering evidence presented by any party.

Recordkeeping

All records, including transcripts, audio recordings, and video recordings, related to any complaint lodged under this Policy will be kept for seven (7) years.

No Retaliation

Neither Walden nor any other person may intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX or this Policy, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under this part. Any complaint alleging retaliation may be filed according to the grievance procedures set forth in this Policy.

Sources of Counseling, Advocacy, and Support

Victims of Sexual Assault, which is included herein as a form of Sexual Harassment can receive assistance immediately by calling the local police department (911, if emergency). In addition, students with complaints of any type of Sexual Harassment may contact the Student Assistance Program (SAP) by calling 1-866-465-8942 or TDD: 1-800-697-0353. When contacting the SAP, please reference Walden's ID, SAP4EDU. Walden University employees may contact the Employee Assistance Program (EAP) by contacting Business Health Services (BHS) at 800-765-3277 or online: at www.bhsonline.com (user name: Laureate). Both the SAP and EAP are free, "Confidential Resources" at Walden University, which means that all conversations will remain confidential and will not initiate any type of investigation into the incident.

Time Frame for Process: While each situation is different and there can be no way to determine how long an investigation will take, the Title IX Coordinator shall endeavor to reach an initial decision within 90 days from the time the complaint is reported. Similarly, the Appeals Official shall endeavor to reach a decision within 90 days from the time the appeal is filed.

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TITLE IX COMPLAINT RESOLUTION AND PREVENTION POLICY

NONDISCRIMINATION POLICY STATEMENT AND NOTICE OF NONDISCRIMINATION

Walden is committed to providing an educational environment free of discrimination, unlawful harassment, and retaliation. Walden does not discriminate on the basis of sex and prohibits sex discrimination in any educational program or activity that it operates, including admission and employment, as required by Title IX and applicable local, state or federal laws. See full Notice of Nondiscrimination and Nonharassment.

Inquiries about Title IX may be referred to Walden Title IX Coordinator, the Director, Office of Equity and Access (OEA), or the U.S. Department of Education's Office for Civil Rights, all listed below.

Walden Title IX Coordinator is:

The policies outlined in this document are current as of September 15, 2025. The most current versions of the policies are available online.

Gina Dyson
Dean, Student Affairs
Walden
667.217.1974
titleix@walden.edu

OEA Director is:
Danica Myers
Director, OEA
Adtalem Global Education
872.250.0113
Equity@adtalem.com

U.S. Department of Education Office for Civil Rights:
Lyndon Baines Johnson Department of Education Bldg.
400 Maryland Avenue, SW
Washington, D.C. 20202-1100
Telephone: 800-421-3481

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FAX: 202-453-6012; TDD: 800-877-8339

Email: OCR@ed.gov

To report information about conduct that may constitute sex discrimination or make a complaint of sex discrimination under Title IX, please contact equity@adtalem.com.

For the complete notice of non-discrimination, please see Walden's Non-Discrimination Statement.

REVISION OF THIS POLICY

Walden reserves the right to make changes to this Policy as necessary, and once those changes are posted online, they are in effect. If law or regulations change, or court decisions alter requirements in a way that affects this Policy, the Policy will be construed to comply with the most recent law, regulation or court decision and will be updated accordingly.

DEFINITIONS

“Advisor” means an individual who provides support or advice to a Complainant or a Respondent, and/or participates formally as an Advisor during the Hearing Panel process further described below.

“Appeal” means a process for a party to request a review of certain determinations made by the Title IX Coordinator, Investigator or Hearing Panel based on specific criteria set forth in this Policy.

“Appellate Officer” means the individual who will review appeals filed by a party. The Appellate Officer will be impartial and free from demonstrated bias and free from any actual conflict of interest and will disclose any real or reasonably perceived conflicts of interest to the OEA Director and Title IX Coordinator as soon as such conflicts are discovered by the Appellate Officer. The Appellate Officer will have training in reviewing appeals under this Policy.

“Affirmative consent” is defined as an affirmative agreement that is informed, conscious, voluntary, and ongoing, to engage in a mutually agreed upon sexual activity.

Consent can only be given when free from intimidation, force, threat of force, and/or coercion. Lack of protest, lack of resistance, and/or silence does not automatically constitute consent. An individual's manner of dress does not constitute consent.

Consent can be verbal or non-verbal, as long as the words and/or actions are understood to be an agreement to participate in a specific sexual activity. Solely non-verbal communication before and/or during sexual activity can result in misunderstanding which could result in a violation of this Policy. No person should make assumptions about consent. To avoid confusion or ambiguity, Effective August 1, 2024: This Policy does not currently apply to conduct occurring in the following states: Alaska, Arkansas, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Mississippi, Missouri, Montana, Nebraska, North Dakota, Ohio, South Dakota, Tennessee, Texas, Utah, Virginia, West Virginia and Wyoming. For conduct occurring in those states, please refer to the Policy effective August 2020, available at: <https://www.waldenu.edu/-/media/walden/files/legal/walden-university-title-ix-Policy-revisions-final-102020.pdf>

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all individuals are encouraged to talk with one another before engaging in sexual activity. Each person involved in the sexual activity is responsible for ensuring they have consent of the other(s) to engage in it. The perspective of a reasonable person will be the basis for determining whether consent has been given.

Consent can be withdrawn at any time. An individual who wishes to withdraw consent must communicate, through clear words or actions, that they wish to cease the sexual activity. Once consent is withdrawn, the sexual activity must end.

Previous relationships, including past sexual relationships, do not imply consent to future sexual acts. Consent to one form of sexual activity cannot automatically imply consent to other forms of sexual activity. A person's consent to engage in sexual activity with one person does not constitute consent to engage in sexual activity with another.

An individual cannot give consent to sexual activity if that person is unable to understand the nature of the activity or give informed consent due to temporary or permanent incapacitation. A person may be incapacitated due to use of alcohol or drugs, being asleep or unconscious, being underage, or due to mental or physical impairment. If an individual gives consent initially but becomes incapacitated during a sexual activity, the sexual activity must end.

The perspective of a reasonable person evaluating another person's physical and/or verbal functions will be the basis for determining that person's ability to give consent. Consent is required regardless of whether the person initiating sexual activity is under the influence of drugs and/or alcohol. Reasonable steps must be taken to ascertain consent from each individual.

"Colleague" refers to an employee of Walden.

"Colleague Code of Conduct" refers to the "Adtalem Code of Conduct and Ethics" Code of Conduct 082319 (adtalem.com), which is applicable to colleagues at all Adtalem Global Education universities and offices and outlines colleagues' rights and responsibilities.

"Colleague complaint procedure" is the process by which colleagues can bring to the administration's attention any complaint relating to their experience with Walden or a member of Walden community. It is the mechanism for investigating and trying to resolve complaints raised by colleagues and can be found in the Commons (apps.adtalem.com > Commons- HR Portal > Policy Central).

"Complainant" is either a student or employee who is alleged to have been subjected to conduct that could constitute sex discrimination under this Policy; or a person other than a student or employee who is alleged to have been subjected to conduct that could constitute sex discrimination under this Policy and who was participating or attempting to participate in Walden's education program or activity at the time of the alleged sex discrimination.

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“Complaint” is an oral or written report, alleging sex discrimination against a Respondent prompting Walden to investigate and make a determination about the allegations. The following persons have a right to make a complaint of sex discrimination, including complaints of sex-based harassment: a Complainant; a parent, guardian, or other authorized legal representative with the legal right to act on behalf of a Complainant; and the Title IX Coordinator. With respect to complaints of sex discrimination other than sex-based harassment, in addition to the persons listed in the preceding sentence, any student or employee, or any person other than a student or employee who was participating or attempting to participate in Walden's education program or activity at the time of the alleged sex discrimination has the right to make a complaint. In the event that the Title IX Coordinator initiates a Complaint, this act does not make the Title IX Coordinator the Complainant for purposes of this Policy. A complaint may be filed with the OEA Director or Title IX Coordinator in person, by telephone, or by email, by using the contact information listed in this Policy. Individuals who would like more information about filing a Complaint are invited to contact the Title IX Coordinator for additional information.

“CRC” refers to the Coaching Resource Center, which is available to managers to assist in addressing colleague relations concerns, including complaints about colleague or vendor conduct.

“Day” means business day when Walden is open. This does not include weekends, holidays or inclement weather days when Walden is closed.

“Director” means the OEA Director.

“Hearing Panel” means a minimum of three (3) appropriately trained individuals who are appointed by the OEA Director to address sex-based harassment allegations by conducting a hearing to determine if a Respondent is responsible for violating the Policy. If Respondent is found responsible, a Hearing Panel will make sanction and remedy recommendations.

“Member of Walden community” includes students, faculty members or staff and any other individuals associated with Walden. The Director or Title IX Coordinator shall determine a person’s status in a particular situation.

“Notice” refers to any information regardless of whether it is direct, indirect, partial or complete received by a colleague that indicates possible sex discrimination. When notice is received, colleagues, with the exception of confidential employees, are required to inform the Director or Title IX Coordinator.

“Party” or “Parties” means the Complainant and Respondent separately or jointly.

“Program or Activity” means on or off campus locations, events, or circumstances over which Walden exercises substantial control over both the Respondent and the context in which the Prohibited Conduct occurred.

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“Prohibited Conduct” is conduct that is prohibited by this Policy which includes sex discrimination, sex-based harassment, and/ or retaliation. These terms are further defined in this Policy.

“Recipient” means Walden.

“Respondent” means the person who allegedly committed a violation of this Policy. A Respondent may be a student, employee, or a volunteer.

“Student” means any person who has gained admission to Walden and/or matriculated at Walden.

“Title IX Coordinator” means Walden-based employee responsible for coordinating Walden efforts to comply with its responsibilities under this Policy.

POLICY SCOPE

This Policy applies to any person participating in or attempting to participate in Walden's educational program or activity. This may include prospective students, guests to campus, applicants, visiting athletes, admitted students, students who are registered or enrolled for credit or non-credit bearing coursework, or who are on a leave of absence or suspension. This Policy also applies to Walden colleagues. Title IX applies to sex discrimination committed against members of Walden community in the United States occurring as part of Walden's education programs or activity. This includes allegations of sex discrimination impacting Walden's education programs or activities in the United States, even when some conduct alleged to be contributing to the hostile environment occurred outside of Walden's education program or activity and/or outside of the United States.

This Policy is applicable only to alleged incidents that occurred on or after August 1, 2024. For incidents that occurred prior to August 1, 2024, please refer to the Policy effective August 2020, available at: Walden 2020 Title IX Policy

GENERAL POLICY PROVISIONS

Title IX Coordinator and OEA Staff

The Title IX Coordinator coordinates Walden's efforts to comply with its Title IX responsibilities.

Title IX Coordinator: Gina Dyson

Dean, Student Affairs

Walden

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667.217.1974 | titleix@walden.edu

The Title IX Coordinator, working in conjunction with the OEA, is responsible for implementing this Policy. This may include intaking reports and Complaints of Sex Discrimination and providing supportive measures.

OEA Staff: Danica Myers

Director, OEA

Kendall Horneman

Equity Investigator

Amber Callahan

Equity Coordinator

Standard of Proof and Presumptions

The standard of proof in all cases will be the preponderance of the evidence. This means that a

finding of responsibility requires that it is more likely than not, based on all the relevant evidence and reasonable inferences from the evidence, that the Respondent engaged in prohibited conduct in violation of this Policy.

Respondent is presumed not responsible for the alleged sex discrimination unless and until a finding has been made, at the conclusion of the process and by a preponderance of the evidence, that the Respondent has engaged in prohibited conduct which violates this Policy.

Burden of Investigating

The burden of conducting an investigation that gathers evidence sufficient to reach a determination regarding responsibility in each complaint rests on Walden and not the parties.

Evidence Limitations

Walden will objectively evaluate all evidence that is relevant and not otherwise impermissible, including both inculpatory and exculpatory evidence. Credibility determinations will not be based on a person's status as a complainant, witness, or respondent. Walden will not use, rely on or seek disclosure of information protected under a legally recognized privilege, or evidence provided to a confidential employee, unless the person to whom the privilege or confidentiality is owed has waived the privilege. Walden will not access or use a party or witness' medical, psychological, and similar treatment records unless the party or witness provides voluntary, written consent.

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Walden will not use, rely on, or seek to disclose evidence that relates to the complainant's sexual interests or prior sexual conduct, unless evidence about such prior conduct is offered to prove that someone other than the respondent committed the alleged prohibited conduct or is evidence about specific incidents of the complainant's prior sexual conduct with the respondent that is offered to prove consent to the alleged sex-based harassment. The fact of prior consensual sexual conduct between the parties does not by itself demonstrate or imply that the complainant consented to the alleged sex-based harassment or preclude determination that sex-based harassment occurred.

Free Expression and Academic Freedom

Walden is committed to free expression and academic freedom. Nothing in this Policy is meant to infringe upon the free expression of colleagues and students. Walden will consider free expression and academic freedom in the consideration and investigation of Complaints under this Policy.

Disability Accommodations

OEA partners with the Office of Student Disability Services (OSDS) on the provision of reasonable accommodations for students with disabilities. If you require an accommodation to participate fully in any part of the processes set forth in the Policy, contact the Director at your earliest convenience. If you have the requested accommodation on file with OSDS, OEA will implement the accommodation with assistance from OSDS. If you do not have the requested accommodation on file, OEA will connect you with OSDS to initiate the accommodation request process.

Confidentiality and Prohibited Disclosures of Personally Identifiable Information

Walden will take reasonable steps to keep confidential the identity of the Complainant, Respondent, and witnesses, but cannot guarantee confidentiality. These steps will not restrict the ability of the parties to obtain and present evidence, including by speaking to witnesses; consulting with family members, confidential resources, or advisors; or otherwise prepare for or participate

in the complaint resolution process. Walden shall not disclose personally identifiable information obtained in the course of its complaint resolution process except 1) upon prior written consent from a person with the legal right to consent to disclosure; 2) when information is disclosed to a parent, guardian, or other authorized legal representative with a legal right to receive such disclosures; 3) to carry out this Policy including action to address conduct that may reasonably constitute sex discrimination; 4) as required by federal law, regulation, or terms and conditions of a federal award; and 5) to the extent that such disclosure is not in conflict with Title IX when required by state or local law or when permitted under FERPA.

Requests for Extensions and Delays

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The Director or Title IX Coordinator may extend any deadlines within this Policy, for a reasonable amount of time, on a case-by-case basis, for good cause. The Complainant and Respondent will be notified in writing of any extension, the reasons for it, and projected new timelines.

Retaliation Prohibited

Retaliation means intimidation, threats, coercion, or discrimination against any person by Walden, a student, or an employee or other person authorized by Walden to provide aid, benefit, or service under Walden's education program or activity, for the purpose of interfering with any right or privilege secured by Title IX or this part, or because the person has reported information, made a complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing, including in an informal resolution process, in complaint procedures under and in any other actions taken by Walden. Nothing in this definition precludes Walden from requiring an employee or other person authorized by Walden to provide aid, benefit, or service under Walden's education program or activity to participate as a witness in, or otherwise assist with, an investigation, proceeding, or hearing under this part.

Training

Walden ensures that its Title IX personnel have adequate annual training. The Title IX Coordinator, OEA Staff, Investigators, Hearing Panel, and Appellate Officers are trained, as applicable, on the definition of sex discrimination and all prohibited conduct, the scope of Walden's Education Program or Activity, how to conduct an investigation, Walden's complaint process (including hearings, appeals, and informal resolution processes, as applicable) and how to serve impartially by avoiding prejudgment of the facts at issue, conflicts of interest, and bias. Informal resolution facilitators are trained on the informal resolution process.

All Walden employees will be trained on Walden's obligation to address sex discrimination, the scope of conduct constituting sex discrimination, and all notification and information-sharing requirements, at the time of hire and annually thereafter.

Materials used to train Walden personnel may be requested directly from the Director or Title IX Coordinator.

In accordance with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act ("Clery Act") and the Violence Against Women Reauthorization Act of 2013 ("VAWA"), Walden will provide primary prevention and awareness programs to prevent Sexual Assault, Dating Violence, Domestic Violence and Stalking to incoming students and new Colleagues during their first semester.

No Bias or Conflict of Interest

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Any Walden employee acting under this Policy shall be free from any actual conflict of interest or demonstrated bias that would impact the employee's obligations to carry out this Policy. Should the OEA Director have a conflict of interest, the OEA Director is to immediately notify the appropriate Walden Campus President, who will determine whether a conflict of interest or bias exists, in which case the Campus President shall designate an Acting Director for purposes of carrying out the handling and finalization of the matter at issue. Should any Title IX Coordinator, Investigator, Hearing Panel member, or Appellate Officer have a conflict of interest or bias, they are to notify the OEA Director upon discovery of the conflict. To raise any concern involving bias or conflict of interest, contact the OEA Director, Danica Myers, by phone at 872.250.0113 or by email at equity@adtalem.com.

Amnesty for Participating Parties and Witnesses

Walden recognizes that students who have been participating in a possible student conduct violation such as academic integrity, drinking and/or using drugs at the time of the prohibited conduct under this Policy may be hesitant to report incidents due to fear of potential consequences for their own conduct. Walden strongly encourages the reporting of prohibited conduct. A student bystander or participating party, or witness acting in good faith who discloses any incident of prohibited conduct under this Policy shall not be subject to action under Walden's Code of Conduct for violation of academic integrity, alcohol and/or drug use occurring at or near the time of the commission of the prohibited conduct. Walden, however, reserves the right to take steps necessary to address health and safety concerns for the individual and the community, as well as the right to report truthfully to licensing bodies. Additionally, Walden reserves the right to take necessary action if it is determined that the student conduct violation was egregious.

Supportive Measures

The Title IX Coordinator will provide Supportive Measures as necessary. Supportive Measures are individualized measures reasonably available without fee or charge to ensure equal access to educational programs and activities, protect safety of the parties, provide support during the complaint process or informal resolution process, and further deter prohibited activity. Supportive Measures are available, as appropriate to either or both the Complainant and Respondent and are non-punitive, non-disciplinary and not unreasonably burdensome to the other party. Examples include counseling, extensions of time or other course related adjustments, modifications to work or class schedules, campus escort services, restrictions on contact between the parties, leave of absence, increased security and monitoring of certain areas on campus, and other similar measures. Supportive Measures are individualized and appropriate based on the information gathered by the Title IX Coordinator. The Supportive Measures needed by the Complainant and/or Respondent may change over time, and the Title IX Coordinator will communicate with each party to ensure that any Supportive Measures are necessary and effective based on evolving needs.

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Once the Title IX Coordinator receives a report of prohibited conduct, the Title IX Coordinator will promptly contact the Complainant confidentially to discuss the availability of Supportive Measures (available with or without filing a Complaint) and explain the process for filing a Complaint and provide a copy of this Policy. The Title IX Coordinator will consider the Complainant's wishes with respect to Supportive Measures.

Walden will maintain the privacy of the Supportive Measures, provided that privacy does not impair Walden's ability to provide the Supportive Measures.

A Party will be provided written notice of the supportive measures provided to that Party outlining the reason(s) for any denials, modifications or reversals, if applicable, and of the right to appeal.

All appeals will be assigned an Appellate Officer to review the appeal and make a decision. All appeal decisions are final.

Emergency Removal

Walden can remove a Respondent entirely or partially from an education Program or Activities on an emergency basis when an individualized safety and risk analysis has determined that an imminent and serious threat to the health or safety of the complainant, any students, employees, or other persons arising from the allegations of sex discrimination justifies removal. The risk analysis is performed by the Title IX Coordinator in conjunction with the Director, Enterprise Safety and Security.

In cases in which an emergency removal is imposed, the Respondent will be given notice of the action and the option to challenge the emergency removal immediately following the removal.

The Title IX Coordinator has sole discretion under this Policy to implement or stay an emergency removal and to determine the conditions and duration. Violation of an emergency removal under this Policy will be grounds for discipline, which may include expulsion or termination.

Walden will implement the least restrictive emergency actions possible in light of the circumstances and safety concerns. As determined by the Title IX Coordinator, these actions could include, but are not limited to: temporarily re-assigning a Colleague, restricting a student's or Colleague's access to the campus, allowing a student to withdraw or take grades of incomplete without financial penalty, and authorizing an administrative leave.

SEX DISCRIMINATION--PROHIBITED CONDUCT

Prohibited conduct detailed below includes actual and attempted conduct.

A. Sex-based Discrimination includes discrimination on the basis of sex, sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity.

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B. Sex-based Harassment: Sex-based harassment is a form of sex-discrimination. It is conduct on the basis of sex that satisfies one or more of the following:

1. An employee, agent, or other person authorized by Walden to provide an aid, benefit or service under Walden's education program or activity, either explicitly or impliedly condition the provision of such aid, benefit, or service on a Complainant's participation in unwelcome sexual conduct (i.e. Quid Pro Quo);

2. Unwelcome sex-based conduct that based on the totality of the circumstances, is subjectively and objectively offensive and is so severe or pervasive that it limits or denies a Complainant's ability to participate in or benefit from Walden education program or activity (i.e., creates a hostile environment).

3. Sexual Assault includes both forcible and non-forcible sexual offenses as defined by the Clery Act and included below:

a. Sexual offenses, Forcible: Any sexual act directed against a Complainant without the consent of the Complainant, including instances in which the Complainant is incapable of giving consent.

i Penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of a Complainant, without the consent of the Complainant.

ii Oral or anal sexual intercourse with a Complainant, forcibly, and/or against that Complainant's will (non-consensual), or not forcibly or against the Complainant's will in instances in which the Complainant is incapable of giving consent because of age or because of temporary or permanent mental or physical incapacity.

iii The use of an object or instrument to penetrate, however slightly, the genital or anal opening of the body of a Complainant, forcibly, and/or against that Complainant's will (non-consensually) or not forcibly or against the Complainant's will in instances in which the Complainant is incapable of giving consent because of age or because of temporary or permanent mental or physical incapacity.

iv The touching of the private body parts of a Complainant (buttocks, groin, breasts), for the purpose of sexual gratification, forcibly, and/or against that Complainant's will (non-consensually), or not forcibly or against the Complainant's will in instances in which the Complainant

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is incapable of giving consent because of age or because of temporary or permanent mental or physical incapacity.

b. Sexual Offenses, Non-forcible, includes any of the following:

a. Incest: Non-forcible sexual intercourse between persons who are related to each other, within the degrees wherein marriage is prohibited by state or local law.

b. Statutory Rape: Non-forcible sexual intercourse, with a Complainant who is under the statutory age of consent in accordance with state or local law.

4. Dating Violence: Violence, on the basis of sex, committed by a person, who is in or has been in a social relationship of a romantic or intimate nature with the Complainant. The existence of such a relationship shall be determined based on the Complainant'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. 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.

5. Domestic Violence 1

: Violence, on the basis of sex, which is a felony or misdemeanor crime, committed by a current or former spouse or intimate partner of the Complainant, by a person with whom the Complainant shares a child in common, or by a person who is cohabitating with, or has cohabitated with the Complainant as a spouse or intimate partner, or by a person similarly situated to a spouse of the Complainant under the state or local domestic or family violence laws of residency, or by any other person against an adult or youth Complainant who is protected from that person's acts under the domestic or family violence laws in which the conduct occurred.

6. Stalking: Engaging in a course of conduct, on the basis of sex, directed at a specific Complainant, 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,

1 An incident of Domestic Violence necessitates a relationship between Complainant and Respondent which exceeds

two people living together as "roommates" and means that those individuals cohabitating must involve a current or

former intimate relationship or spousal relationship.

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a "course of conduct" means two or more acts, including, but not limited to acts in which the Respondent 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.

b Reasonable person means a reasonable person under similar circumstances and with similar identities to the Complainant.

c Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

C. Retaliation means intimidation, threats, coercion, or discrimination against any person by Walden, a student, or an employee or other person authorized by the recipient to provide aid, benefit, or service under the recipient's education program or activity, for the purpose of interfering with any right or privilege secured by Title IX or this part, or because the person has reported information, made a complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing, including in an informal resolution process, in complaint processes under this Policy and in any other actions taken by a recipient. Nothing in this definition precludes Walden from requiring an employee or other

person authorized by Walden to provide aid, benefit, or service under Walden's education program or activity to participate as a witness in, or otherwise assist with, an investigation, proceeding, or hearing under this part.

REPORTING SEX DISCRIMINATION

Any person can report sex discrimination, including sex-based harassment (whether or not the person reporting is the alleged victim) in person, by mail, telephone, or e-mail, using the contact information listed above for the Title IX Coordinator. A report can be made at any time, including during non-business hours. However, responses to reports made outside of business hours, including during weekends and holidays, may be delayed.

If you believe that you have experienced or witnessed sex-based harassment, Walden encourages you to notify the Title IX Coordinator as soon as possible after the incident. A report may be made to either or both the police and the Title IX Coordinator; however, please be aware that the criminal process is separate from Walden's Title IX complaint resolution process. Complainants have the option to notify law enforcement directly or be assisted in doing so. If requested, Walden will assist a victim of sex-based harassment in contacting the police. A Complainant is not required to contact the police to pursue Walden's complaint process.

Reports can be made by victims, third parties or bystanders with the option to remain anonymous through the SpeakUp Adtalem ("SpeakUp") program 1.866.421.0617, or online at speakupadtalem.ethicspoint.com SpeakUp is a reporting system managed by a third-party vendor (Ethics Point), which encourages members of Walden community to come forward with questions or concerns, including allegations of sex-based harassment. Reports can be made anonymously, or Effective August 1, 2024: This Policy does not currently apply to conduct occurring in the following states: Alaska, Arkansas, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Mississippi, Missouri, Montana, Nebraska, North Dakota, Ohio, South Dakota, Tennessee, Texas, Utah, Virginia, West Virginia and Wyoming. For conduct occurring in those states, please refer to the Policy effective August 2020, available at: <https://www.waldenu.edu/-/media/walden/files/legal/walden-university-title-ix-Policy-revisions-final-102020.pdf>

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reporters can provide their name and contact information. Colleagues are expected to ask legal, compliance and ethics questions and report suspected wrongdoing. Colleagues and students can utilize the SpeakUp program by contacting the third-party contractor Ethics Point by phone at 1.866.421.0617, or online at speakupadtalem.ethicspoint.com.

There is no time limitation on providing notice/complaints to the Title IX Coordinator. However, if the Respondent is no longer subject to Walden's jurisdiction and/or significant time has passed, the ability to investigate, respond, and provide remedies may be more limited or impossible. Acting on notice/complaints significantly impacted by the passage of time (including, but not limited to, the rescission or revision of Policy) is at the discretion of the Title IX Coordinator, who may document allegations for future reference, offer Supportive Measures and/or Remedies, and/or engage in informal or formal action, as appropriate. When notice/complaint is affected by a significant time delay, Walden will apply the Policy that was in place at the time of the notice/complaint.

As required by the Clery Act, Walden will issue timely warnings for incidents reported that pose a substantial threat of bodily harm or danger to other members of the campus community. Walden will make every effort to ensure that a victim's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the danger. Walden reserves the right to notify parents/guardians of dependent students regarding any health or safety risk, or a change in student status.

Personally identifiable information for victims of Sexual Assault, Dating Violence, Domestic

Violence and Stalking will not be included in any publicly available recordkeeping, including Clery Act Reporting and disclosures such as the ASR.

COMPLAINT RESOLUTION PROCESSES

Walden provides an Informal Resolution Process and two Formal Resolution Processes for resolving complaints of prohibited conduct. The Formal Resolution Processes are:

- Formal Investigation with Hearing Determination
- Formal Investigation with Investigator Determination

Complaints involving allegations of Sex-based Harassment where any party is a student are required to be resolved using either the informal resolution process or the formal investigation with hearing determination. All other Complaints are required to be resolved using either the informal resolution process or the formal investigation with investigator determination. Walden utilizes a prompt, equitable and impartial process to evaluate Complaints. Title IX personnel will objectively evaluate all relevant evidence and avoid credibility determinations based on a person's status as a Complainant, Respondent or witness.

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Both parties will receive equal opportunity to provide information, witness statements, evidence, and other information that may be necessary to fully evaluate the allegations. Both parties will be afforded equitable rights and access during the Complaint process. The Respondent is presumed not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the Complaint process.

Generally, the Complaint resolution process consist of a Complaint, Notice of Allegations, investigation, an opportunity to review and respond to the evidence, either an investigator determination or live hearing to reach a determination, and disciplinary measures (in cases with a finding of responsibility), remedies, and appeal (if applicable). The Complaint resolution process, barring extenuating circumstance, will typically conclude within 120 days from the date a Complaint is filed. Walden has discretion to extend this timeline in appropriate circumstances as determined by Walden.

In certain circumstances where Walden has received allegations of sex discrimination, namely the absence of a complaint or the withdrawal of any or all of the allegations in a complaint, and in the absence or termination of an informal resolution process, the Title IX Coordinator must determine whether to initiate a complaint of sex discrimination. After considering factors required by law and any other factors, if the Title IX Coordinator determines that the conduct as alleged presents an imminent and serious threat to the health or safety of the Complainant or other person, or that the conduct as alleged prevents Walden from ensuring equal access on the basis of sex to its education program or activity, the Title IX Coordinator may initiate a complaint.

INFORMAL RESOLUTION PROCESS

If the Title IX Coordinator deems it appropriate and both parties voluntarily consent in writing, Complaints can be resolved through informal resolution, such as mediation. The Title IX Coordinator will facilitate an appropriate informal resolution process depending on the nature of the allegations, the parties involved, and the overall circumstances. If an informal resolution is determined to be appropriate, and agreed upon by both parties, it will be conducted by a facilitator, who will be designated by the Title IX Coordinator. At any time prior to agreeing to an informal

resolution, any party has the right to withdraw from the informal resolution process and resume a formal resolution process.

Before beginning the informal resolution process, the Title IX Coordinator will provide the parties with a written notice containing the following information:

- The allegations;
- The requirements of the informal resolution process;
- That, prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and to initiate or resume a formal resolution process;

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- That the parties' agreement to a resolution at the conclusion of the informal resolution process would preclude the parties from initiating or resuming a formal resolution process arising from the same allegations;
- The potential terms that may be requested or offered in an informal resolution agreement, including notice that an informal resolution agreement is binding only on the parties; and
- What information Walden will maintain and whether and how Walden could disclose such information for use in its formal resolution processes if formal resolution processes are initiated or resumed.

FORMAL RESOLUTION PROCESSES

Notice of Allegations (NOA)

Upon initiation of Walden's formal resolution processes, Walden will notify the parties of the following:

- Walden's Title IX formal resolution processes and any informal resolution process;
- Sufficient information available at the time to allow the parties to respond to the allegations, including the identities of the persons involved in the incident(s), the conduct alleged to constitute sex discrimination, and the date(s) and location(s) of the alleged incident(s). This can be a description of the evidence or direct access to the evidence;
- If Walden provides a description of the evidence, the parties are entitled upon request to an equal opportunity to obtain the relevant and not otherwise impermissible evidence; and
- Retaliation is prohibited.

If, in the course of an investigation, Walden decides to investigate additional allegations of sex discrimination by the respondent toward the complainant that are not included in the initial notice provided or that are included in a complaint that is consolidated, Walden will notify the parties of the additional allegations.

Investigation of Complaints

Walden will provide for adequate, reliable, and impartial investigation of complaints:

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- Walden , not the parties, has the burden to conduct an investigation that gathers sufficient evidence to determine whether sex discrimination occurred.
- Walden will provide to a party whose participation is invited or expected, written notice of the date, time, location, participants, and purpose of all meetings or proceedings with sufficient time for the party to prepare to participate.
- Walden will provide the parties with the same opportunities to be accompanied to any meeting or proceeding by the advisor of their choice, who may be, but is not required to be, an attorney.
- Walden will not limit the choice or presence of the advisor for the complainant or respondent in any meeting or proceeding.
- Walden may establish restrictions regarding the extent to which the advisor may participate in these complaint procedures, as long as the restrictions apply equally to the parties. Please see the “advisor” definition and “Role of Advisor” section in this Policy for more information.
- Walden will provide the parties with the same opportunities, if any, to have people other than the advisor of the parties’ choice present during any meeting or proceeding. Walden reserves the right to limit the parties to having only an advisor present during any meeting or proceeding.
- Walden will provide an equal opportunity for the parties to present fact witnesses and other inculpatory and exculpatory evidence that is relevant and not otherwise impermissible. Typically, the investigation phase will take approximately 90 days from the NOA to gather all necessary information and to draft the investigation report. Walden has discretion to extend this timeline in appropriate circumstances.
- Walden will review all evidence gathered through the investigation and determine what evidence is relevant and what evidence is impermissible regardless of relevance.
- Walden will provide each party and the party’s advisor, if any, with an equal opportunity to access the evidence that is relevant to the allegations and not otherwise impermissible, in the following manner:
 - Walden will provide an equal opportunity to access either the relevant and not otherwise impermissible evidence, or a written investigative report that accurately summarizes this evidence. If Walden provides access to an investigative report, Walden will further provide the parties with an equal opportunity to access the relevant and not otherwise impermissible evidence underlying the report upon the request of any party. Both parties will have 10 days to review and respond in writing to the evidence;
 - Walden will provide a reasonable opportunity to review and respond to the evidence or the investigative report. If Walden conducts a live hearing as part of its complaint procedures, it will provide this opportunity to review the evidence in advance of the live hearing. Parties will be given ten (10) days prior to the Hearing to review all documentation; and

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- Walden will take reasonable steps to prevent and address the parties' and their advisors' unauthorized disclosure of information and evidence obtained solely through the complaint process.

Dismissal of Complaints

Walden may dismiss a Complaint, or any allegations therein, at any time during the investigation or hearing phase, if:

- Walden is unable to identify the respondent after taking reasonable steps to do
- so;
- The respondent is not participating in Walden's education program or activity and is not employed by Walden ;
- The complainant voluntarily withdraws any or all of the allegations in the complaint, the Title IX Coordinator declines to initiate a complaint, and Walden determines that, without the complainant's withdrawn allegations, the conduct that remains alleged in the complaint, if any, would not constitute sex discrimination under Title IX even if
- proven; or
- Walden determines the conduct alleged in the complaint, even if proven, would not constitute sex discrimination under Title IX. Before dismissing the complaint on this basis, Walden will make reasonable efforts to clarify the allegations with the complainant.

Walden retains discretion on a case-by-case basis to dismiss a Complaint based on any of the above reasons. Satisfaction of one or all of the conditions does not mean Walden will automatically dismiss the Complaint. Instead, Walden will determine if such a decision is appropriate under the circumstances. A dismissal does not preclude action by Walden under separate Walden code of conduct policies.

If a Complaint is dismissed, Walden will provide complainant with reasons in writing for the dismissal and notice of appeal rights. Walden will provide the complainant with an opportunity to appeal the dismissal of a complaint. If the dismissal occurs after the respondent has been notified of the allegations, then Walden will also notify the respondent that the dismissal may be appealed.

Dismissals may be appealed on the following bases:

- Procedural irregularity that would change the outcome;
- New evidence that would change the outcome and that was not reasonably available when the dismissal was made; and
- The Title IX Coordinator or investigator, had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that would change the outcome.

If the dismissal is appealed, Walden will:

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- Notify the parties of any appeal, including notice of the allegations, if notice was not previously provided to the respondent;
- Implement appeal procedures equally for the parties;
- Ensure that the Appellate Officer did not take part in an investigation of the allegations

or dismissal of the complaint;

- Ensure that the Appellate Officer has been trained consistent with the Title IX regulations;
- Provide the parties a reasonable and equal opportunity to make a statement in support of, or challenging, the outcome; and
- Notify the parties of the result of the appeal and the rationale for the result.

All appeals will be assigned an Appellate Officer to review the appeal and make a decision. A dismissal appeal decision is Walden's final decision, and no further appeal to Walden will be permitted. Parties will have 5 days to file an appeal after the dismissal is issued. The Appellate Officer generally should take 14 days to issue a decision. Walden has discretion to extend the timeline in appropriate circumstances as determined by Walden.

Investigation with Investigator Determination

For all non-dismissed Complaints containing allegations of sex discrimination and any non-dismissed Complaints containing allegations of sex-based harassment that concern colleague-on-colleague prohibited conduct, the Investigator will draft a determination after the review and response period provided to the parties. The written determination will include analysis of the evidence collected and a finding of whether the Respondent is or is not responsible for engaging in prohibited conduct, as alleged. If there is a finding of responsibility, there will be remedies and disciplinary recommendations in the determination. Respondent has the right to appeal the determination as described in the Appeal section of this Policy.

Investigation with Live Hearing Determination

If a Complaint is not or cannot be resolved through informal resolution, or the Complaint concerns alleged conduct outside the scope of conduct to be resolved through the Investigator Determination process, Walden will conduct a live hearing. Live hearings are facilitated by a designated Hearing Panel, separate from the Title IX Coordinator or Investigator. The Hearing Panel will be selected by the OEA Director. The Hearing Panel will have no fewer than three (3) members.

Walden will conduct the live hearing with the parties physically present in the same geographic location or, at Walden discretion or upon the request of either party, will conduct the live hearing with the parties physically present in separate locations with technology enabling the Hearing Panel and parties to simultaneously see and hear the parties and witnesses.

Walden will create an audio or audiovisual recording or transcript of any live hearing and make it available to the parties for inspection and review, upon request.

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Walden's process for proposing and asking relevant and not otherwise impermissible questions and follow-up questions of parties and witnesses, including questions challenging credibility, will allow the Hearing Panel to ask such questions, and allow each party to propose such questions that the party wants asked of any party or witness and have those questions asked by the Hearing Panel, subject to the procedure for evaluating and limiting questions described below:

- The Hearing Panel, or the Hearing Panel chair, will determine whether a proposed question is relevant and not otherwise impermissible before the question is posed and will explain any decision to exclude a question as not relevant or otherwise impermissible. Questions that are unclear or harassing of the party or witness being questioned will not be permitted.

The Hearing Panel or the Hearing Panel chair will give a party an opportunity to clarify or revise a question that is determined to be unclear or harassing. If the party sufficiently clarifies or revises the question, the question will be asked.

The Hearing Panel may choose to place less or no weight upon statements by a party or witness who refuses to respond to questions deemed relevant and not impermissible. The Hearing Panel will not draw an inference about whether sex-based harassment occurred based solely on a party's or witness's refusal to respond to such questions.

Hearing Panel Written Determination

The Hearing Panel will issue a written determination regarding responsibility with a description of the complaint resolution process from Complaint through the live hearing, findings of fact, conclusions about whether the alleged conduct occurred, rationale for the conclusion as to each allegation, disciplinary sanctions imposed on the Respondent and whether remedies will be provided to the Complainant. The determination will be sent simultaneously to the parties along with information on how to file an appeal. This determination generally is sent to the parties within 15 days of the live hearing. Walden has the discretion to extend this time period in appropriate circumstances.

Disciplinary Sanctions

Disciplinary sanctions against the Respondent will not be imposed before completion of Walden's complaint process, including any appeal. Following a final Walden decision that prohibited conduct occurred, appropriate corrective action will be taken, and Walden will take steps to prevent recurrence. Disciplinary sanctions will be determined on a case-by-case basis. Any Colleague determined by Walden to be responsible for prohibited acts will be subject to appropriate disciplinary sanction, up to and including termination. Colleagues are also subject to processes and discipline determined by the Human Resources Department. The HR process is separate and apart from the Title IX process and not constrained by the outcome of the Title IX process. Student disciplinary sanctions may include additional training, a restriction on contact, suspension, or expulsion.

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Failure to abide by imposed disciplinary sanctions (whether by refusal, neglect or any other reason), may result in additional disciplinary action, including termination, suspension, or expulsion.

Individuals who make a materially false statement in bad faith in the course of a Title IX complaint process will be subject to Walden's Code of Conduct policies.

Remedies

Remedies are provided to a Complainant whenever a Respondent is found responsible. Student remedies are designed to maintain the Complainant's equal access to education. Remedies will be determined on a case-by-case basis as reasonable under the circumstances. Remedies may include supportive measures.

Appeal

Both parties have the right to appeal an Investigator or Hearing Panel determination regarding responsibility solely on the following bases: (1) procedural irregularity affected the outcome of the matter; (2) there is newly discovered evidence that could affect the outcome of the matter; (3) Title

IX personnel had a conflict of interest or bias that affected the outcome of the matter; (4) the determination was clearly erroneous based on the evidence compiled during the investigation; and/or (5) the proposed sanction(s) was not reasonable based on the evidence compiled during the investigation

An appeal must be submitted in writing to the Title IX Coordinator within ten days of the delivery of the written determination. Appeals will be decided by the Appellate Officer or designee. An appeal decision is Walden's final decision, and no further appeal to Walden will be permitted. The Appellate Officer generally should take 14 days to issue a decision. Walden has discretion to extend the timeline in appropriate circumstances as determined by Walden.

Role of the Advisor

The parties are permitted to bring an Advisor of their own choosing and at their own expense, including a family member or an attorney, to any meeting or proceeding that is held in connection with the investigation and resolution of a Complaint brought under this Policy.

Choosing an advisor who is a witness in the Complaint Process creates potential for bias and conflict of interest. A party who chooses an advisor who is also a witness can anticipate that issues of potential bias will be explored by the Hearing Panel.

The Complainant and Respondent are expected to ask and respond to questions on their own behalf throughout the investigation phase of the Complaint process and during any live hearing. Only the Hearing Panel will question the parties during a live hearing, if applicable. Advisors are expected to advise without disrupting proceedings. For example, advisors should not address Walden

officials in a meeting, hearing, or interview unless invited to do so. An advisor may not make a presentation during any meeting, interview, or hearing and may not speak on behalf of the party to the Investigator or Hearing Panel. If an advisor is disruptive or otherwise fails to respect the limits of the advisor role, the advisor may be asked to leave, or the meeting, hearing, or interview may be terminated.

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Advisors are expected to maintain the privacy of the records shared with them. These records may not be shared with third parties, disclosed publicly, or used for purposes not explicitly authorized by Walden. The Hearing Panel may seek to restrict the role of any advisor who does not respect the sensitive nature of the process or who fails to abide by Walden's privacy expectations.

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PRIMARY PREVENTION AND AWARENESS PROGRAMS ADDENDUM

Prevention and Awareness

Acts that are deemed to fall within the scope of this Policy are violations of the Code of Conduct as well as the expectations for members of Walden community. These acts may also be crimes. To increase the likelihood of intervention and reduce the risk of sex and/or gender-based misconduct

from occurring among its students and colleagues, Walden is committed to providing primary and ongoing awareness and prevention programming.

Primary and ongoing awareness and prevention programs will cover the continuum of issues contemplated by this Policy. Themes will include situational awareness and prevention strategies, such as bystander intervention and other forms of risk reduction. While bystander intervention specifically refers to the safe and effective ways in which third parties can intervene to thwart sex and/or gender-based misconduct, risk reduction also encompasses various strategies to eliminate or reduce risk of harm by avoiding or removing oneself from situations that are dangerous or uncomfortable. Awareness programs are events that occur online or in person that invite active engagement of community members. It is the expectation and responsibility of each member of Walden community to participate in programming which will assist with ongoing prevention efforts as well as effective and efficient identification and response when sex and/or gender-based misconduct does occur.

Primary prevention and awareness programming will include a comprehensive online education platform intended for viewing by all colleagues and students as well as student-facing vendors if necessary and appropriate. The program will be completed by:

- New students and transfer students within three weeks of the start of the student's first session
- Returning and continuing students who did not take the training as a new or transfer student within three weeks of the start of the session the student is scheduled to resume or continue studies
- Colleagues by the date stated in email notification
- Specific vendors by the date stated in email notification

Access to the primary prevention program and its contents will be ongoing throughout the participant's relationship with Walden. Members of Walden community are encouraged to visit this resource regularly for personal, professional and academic purposes.

Ongoing prevention and awareness campaigns consist of public service announcements and campaigns as well as messages and activities integrated into the day-to-day fabric of the academic community. These initiatives are intended to reinforce increased awareness regarding sex and/or gender-based misconduct and prevention strategies throughout the year. Walden will continually seek formal and informal ways to incorporate additional awareness and prevention strategies, e.g., Effective August 1, 2024: This Policy does not currently apply to conduct occurring in the following states: Alaska, Arkansas, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Mississippi, Missouri, Montana, Nebraska, North Dakota, Ohio, South Dakota, Tennessee, Texas, Utah, Virginia, West Virginia and Wyoming. For conduct occurring in those states, please refer to the Policy effective August 2020, available at: <https://www.waldenu.edu/-/media/walden/files/legal/walden-university-title-ix-Policy-revisions-final-102020.pdf>

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active and passive educational campaigns, such as social norms poster campaigns, newsletter articles, presentations and volunteerism with local community resource agencies. When additional ongoing education is provided, the organizer will report that event, activity or effort to the Title IX Coordinator for record keeping and quality assurance purposes. Toolkits including ideas and resources that support ongoing efforts and are related to the primary prevention and awareness programming, will be made available to any campus upon request.

Additional training will be delivered to colleagues responsible for responding to reports of sex and/or gender-based misconduct. These colleagues should complete the primary prevention and awareness programming described above as well as remote or live training and/or consultation with the Title IX Coordinator before and during management of an allegation within the scope of

the Title IX Complaint and Resolution Processes and Policy.

Risk Reduction Tips

Responsibility for sexual misconduct rests with those who commit such acts. Risk reduction tips are not intended to blame the victim. There are precautions we all can take which may limit our exposure to situations which may result in non-consensual sexual acts.

- Communicate limits/ boundaries and respect the limits/boundaries of others.
- Clearly and firmly say “No” to a sexual aggressor.
- If possible, leave the physical presence of a sexual aggressor or otherwise violently aggressive person.
- If someone is nearby, ask for help.
- Take responsibility for your alcohol/drug use. Acknowledge that alcohol/drugs lower sexual inhibitions and may make you vulnerable to someone who sees an impaired person as a sexual opportunity.
- Do not take advantage of someone’s intoxication or altered state even if alcohol or drugs were consumed willingly.
- If you choose to share intimate images, pictures, videos or content with others, even those you trust, be clear about your expectations regarding how the information may be used, shared or disseminated. If such information is shared with you, do not share it with others.
- Take care of friends and ask that they take care of you.
- As a sexual initiator, clearly communicate your intentions and give your sexual partner the opportunity to clearly communicate the same.
- Do not make assumptions about consent, sexual availability, sexual attraction, how far an interaction can go or about physical and/or mental ability to consent.
- Remember that consent should be affirmative and continuous. If there is any question or ambiguity, you should proceed as if you do not have consent.
- Consider mixed messages from a partner to be an indication that sexual conduct should stop so that better communication can occur.

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- Recognize the potential for a sexual partner to feel intimidated or coerced by you as a result of a power advantage, your gender, your demeanor or your physical presence.

Do not use or abuse that power.

Bystander Intervention Strategies

Intervention by classmates, colleagues and others within proximity to the precursors or signs of possible sexual assault, sexual exploitation, dating violence, domestic violence or stalking can significantly impact the course of an interaction between a latent perpetrator and victim.

Bystanders may also encourage friends, classmates and colleagues who are already experiencing victimization to seek assistance sooner than they may have without encouragement, support or acknowledgment. Community members are encouraged to recognize warning signs and to consider possible methods of interference in various scenarios before opportunities to intervene arise. By planning ahead, we all maximize the likelihood of being empowered to take safe actions to either prevent sexual misconduct or offer paths to eliminate ongoing victimization.

When a member of Walden community observes threatening, coercive, forceful, aggressive or harassing behavior, it is important to assess the situation to determine the best possible course of action for all concerned. Some forms of intervention are direct, while others will be less apparent to the perpetrator or others within range of the interaction. Examples include but are not limited to:

- Making up an excuse to get someone out of a dangerous situation.
- Stepping in to change the course of an interaction.
- Warning potential or perceived perpetrators that their actions may lead to severe consequences.
- Refusing to leave the company of a potential victim despite efforts by an aggressor or pursuer to get the potential victim alone.
- Taking steps to reduce alcohol or drug consumption within a potentially dangerous social situation.
- Calling and cooperating with security, administration, the police or others to assist with intervention and accountability.
- Expressing concern or offering resources when you notice someone with unexplained or frequent injuries.
- Refusing to consider sex and/or gender-based misconduct a personal or private matter between the victim and the perpetrator.

Procedures to Follow After a Sexual Misconduct Incident

Effective August 1, 2024: This Policy does not currently apply to conduct occurring in the following states: Alaska, Arkansas, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Mississippi, Missouri, Montana, Nebraska, North Dakota, Ohio, South Dakota, Tennessee, Texas, Utah, Virginia, West Virginia and Wyoming. For conduct occurring in those states, please refer to the Policy effective August 2020, available at: <https://www.waldenu.edu/-/media/walden/files/legal/walden-university-title-ix-Policy-revisions-final-102020.pdf>

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Complainants of any sexual misconduct that might constitute a crime, including domestic violence, dating violence, sexual assault, stalking and rape (including acquaintance rape) have the option and are encouraged to contact local law enforcement authorities. The criminal process is separate from Walden's process.

Whenever possible, Complainants should report to their local law enforcement authorities and/or as described in the Title IX Complaint and Resolution Processes and Prevention Policy as soon as possible and preserve evidence as may be necessary to prove that domestic violence, dating violence, sexual assault or stalking occurred, or to obtain a protection order. Prompt reporting may help deter future assaults and may provide additional opportunity for Complainants to receive the services they need. Steps should be taken to address the physical and emotional trauma associated with the incident.

Recommended steps include:

1. Go to a safe place; go somewhere to get emotional and physical support as needed.
2. Consider reporting the incident to the police. Complainants are not required to report an incident to law enforcement authorities, but Walden can assist the Complainants with contacting the police, if requested.
3. Report the misconduct to the manager of student services, sr. manager of campus operations, one-up manager, campus incident commander, local Walden leadership, Title IX Coordinator or the CRC.
4. For a Complainant's safety and well-being, immediate medical attention is encouraged. Time is a critical factor for evidence collection and preservation that may assist in proving

that the alleged criminal offense occurred or may be helpful in obtaining an order of protection. Being examined as soon as possible, ideally within 120 hours, is important especially in the case of rape and other forms of sexual assault. To preserve evidence, it is recommended that, if at all possible, you do not bathe, shower, douche, eat, drink, smoke, brush your teeth, urinate, defecate or change clothes before that exam. Even if you have already taken any of these actions, you are still encouraged to have prompt medical care. Additionally, you are encouraged to gather bedding, linens or unlaundered clothing and any other pertinent articles that may be used for evidence. Secure them in a clean paper bag or clean sheet. Completing a forensic examination does not require someone to file a police report. To find a location near you that performs free forensic examinations, call the National Sexual Assault Hotline at (800) 656-4673. Resources are also available through the Rape Abuse & Incest National Network (RAINN); www.RAINN.org.

5. Even after the immediate crisis has passed, consider seeking professional counseling and the support of local and specialized support agencies, such as sexual assault recovery centers and domestic violence safe houses. This can help to recover from the psychological effects and provide a safe environment for recovery.

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Resources

Local Resources can be found in Walden's Annual Security Report distributed to each campus community and posted on the Student Consumer Information page of Walden's website. The reports are available by location in a drop-down menu and contains a lists of local resources available to victims of sex and gender-based misconduct. The resource lists are updated annually. To access the ASR, please go to: Walden ASR Report. Additionally, the following resources exist to provide information and links to external assistance:

- National Sexual Assault Hotline 1.800.656.HOPE (4673) rainn.org
- National Domestic Violence Hotline 1.800.799.7233 (TTY) 1.800.787.3224 or text "START" to 88788. thehotline.org
- National Network to End Domestic Violence nnedv.org and womenslaw.org (Legal information and resources)
- National Center for Victims of Crime 202.467.8700 victimsofcrime.org
- [loveisrespect](http://loveisrespect.org) 1.866.331.9474 (TTY) 1.866.331.8453 or text "LOVEIS" to 22522
- 988 Suicide & Crisis Lifeline (Formerly National Suicide Prevention Hotline) phone: 988 988lifeline.org
- Pathways to Safety International 833-SAFE-833 (International Toll-Free) pathwaystosafety.org/ email: crisis@866uswomen.org
- U.S. Embassy usembassy.gov
- Child Welfare Information Gateway 1-800-394-3366 childwelfare.gov

o State Statutes Including Mandatory Reporting Laws
childwelfare.gov/topics/systemwide/laws-policies/state

TITLE IX COMPLAINT RESOLUTION AND PREVENTION POLICY ADDENDUM2

Effective August 1, 2024: This Policy does not currently apply to conduct occurring in the following states: Alaska, Arkansas, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Mississippi, Missouri, Montana, Nebraska, North Dakota, Ohio, South Dakota, Tennessee, Texas, Utah, Virginia, West Virginia and Wyoming. For conduct occurring in those states, please refer to the Policy effective August 2020, available at: <https://www.waldenu.edu/-/media/walden/files/legal/walden□university-title-ix-Policy-revisions-final-102020.pdf>

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For individuals attending or working at Walden campuses located in Illinois, the following policies and/or procedures are modified or supplemented to those set forth in the Title IX Complaint Resolution Processes and Prevention Policy. Walden reserves the right to adjust this Addendum consistent with current law. If any portion of this Addendum is deemed invalid, the invalidity shall not affect other portions of the Title IX Complaint and Resolution Processes and Prevention Policy.

ILLINOIS

Definition of Consent

Illinois Preventing Sexual Violence in Higher Education Act (which applies to conduct occurring in Illinois) utilizes a definition of “Consent” which recognizes that (i) consent is a freely given agreement to sexual activity, (ii) a person's lack of verbal or physical resistance or submission resulting from the use or threat of force does not constitute consent, (iii) a person's manner of dress does not constitute consent, (iv) a person's consent to past sexual activity does not constitute consent to future sexual activity, (v) a person's consent to engage in sexual activity with one person does not constitute consent to engage in sexual activity with another, (vi) a person can withdraw consent at any time, and (vii) a person cannot consent to sexual activity if that person is unable to understand the nature of the activity or give knowing consent due to circumstances, including without limitation the following: (A) the person is incapacitated due to the use or influence of alcohol or drugs; (B) the person is asleep or unconscious; (C) the person is under age; or (D) the person is incapacitated due to a mental disability.

Additional Training

Colleagues at Illinois campuses involved in (i) receipt of a student report of an alleged incident of sexual violence, domestic violence, dating violence, or stalking, (ii) the referral or provision of services to a survivor, or (iii) any campus complaint resolution procedure that results from an alleged incident of sexual violence, domestic violence, dating violence, or stalking will be provided annual survivor-centered and trauma-informed response training. Colleagues at Illinois campuses whose duties include resolution of student complaints receive 8 to 10 hours of annual training on issues related to sexual violence, domestic violence, dating violence and stalking. Training also includes how to apply this Policy.

How to File a Report

Illinois Preventing Sexual Violence in Higher Education Act requires Walden to provide contact information for local law enforcement. Local law enforcement may be reached at:

Addison Campus: 630-543-3080

Chicago Campus: 312-744-8290

Tinley Park Campus: 708-444-5300

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Within 12 hours of when Walden receives an electronic report, students at Illinois campuses will receive information detailed in the “Victim/Survivor Rights” paragraph of this Policy.

Written Determination

Individuals at an Illinois campus will be provided with the written determination within seven (7) days after the determination.

Amnesty for Victims and Witnesses

Amnesty, to encourage reporting, will be provided to individuals at Illinois campuses unless Walden determines that the violation was egregious, including but not limited to, an action that places the health or safety of any other person at risk or involves plagiarism, cheating or academic dishonesty.

External Resources - Addison Campus:

Community-Based Sexual

Assault Crisis Center

YWCA Metropolitan Chicago

Patterson and McDaniel Family Center

55 E. North Avenue

Glendale Heights, IL 60139

630.790.6600

State Sexual Assault Crisis Center

Illinois Coalition Against Sexual Assault

100 N. 16th Street

Springfield, IL 62703

217.753.4117

Medical Facility: nearest to the campus where a survivor may have a medical forensic examination completed at no cost to the survivor, pursuant to the Sexual Assault Survivors Emergency

Treatment Act:

AMITA Health Adventist Glen Oaks Hospital

701 Winthrop Avenue

Glendale Heights, IL 60139

630.545.6160

External Resources - Chicago Campus:

Community-Based Sexual

Assault Crisis Center

Community Counseling Centers of Chicago

4740 N. Clark Street

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Chicago, IL 60640

773.769.0205

State Sexual Assault Crisis Center Illinois

Coalition Against Sexual Assault – RVA □ Northside Office

1945 W. Wilson

Chicago, IL 60651

773.275.8340

Medical Facility: nearest to the campus where a survivor may have a medical forensic examination completed at no cost to the survivor, pursuant to the Sexual Assault Survivors Emergency

Treatment Act:

Advocate Illinois Masonic Medical Center

836 W. Wellington Avenue

Chicago, IL 60657

773.975.1600

External Resources - Tinley Park Campus:

Community-Based Sexual

Assault Crisis Center

YWCA South Suburban Center

320 W. 202nd Street

Chicago Heights, IL 60411

708.754.0486

Rape Crisis Hotline: 708.748.5672 in
the South Suburbs

State Sexual Assault Crisis Center YWCA

Metropolitan Chicago

1 N. LaSalle Street, Suite 1150

Chicago, IL 60602

312.762.6600

Medical Facility: nearest to the campus where a survivor may have a medical forensic examination completed at no cost to the survivor, pursuant to the Sexual Assault Survivors Emergency

Treatment Act:

Advocate S. Suburban Hospital

17800 Kedzie Avenue

Hazel Crest, IL 60429

708.799.8000

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COMPLAINANT AND RESPONDENT RIGHTS ADDENDUM

Complainant and Respondent have the following rights:

1. Be treated with respect by all Walden officials;
2. Be informed of the available support resources or measures available;

3. Be free of any form of retaliation and free to report such retaliation without fear of disciplinary action;
 4. Request a mutual ban from contact with another party or witness;
 5. Be accompanied by one Advisor throughout the process, including at any meetings or interviews;
 6. Experience an adequate, reliable, impartial and prompt investigation of the allegations conducted within a reasonable period of time after the complaint is filed;
 7. Receive written notice of the date, time and location of any interview scheduled with the Investigator and/or Hearing Panel;
 8. Be kept informed of the status of the investigation, to the extent possible, regardless of participation;
 9. The parties are entitled to an equal opportunity to access the relevant and not otherwise impermissible evidence upon the request of any party
 10. Meet with the Investigator and present information on their own behalf, identify witnesses or other third parties who might have relevant information and identify or provide relevant documents or other information the party believes may be helpful to the investigation;
 11. Have past unrelated behavior excluded from the investigation process;
 12. Question the selection of the Title IX Coordinator, Investigator, Hearing Panel, and the Appellate Officer on the basis of an actual conflict of interest or demonstrated bias;
 13. Be notified of the determination and any sanctions applied, if applicable;
- Effective August 1, 2024: This Policy does not currently apply to conduct occurring in the following states: Alaska, Arkansas, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Mississippi, Missouri, Montana, Nebraska, North Dakota, Ohio, South Dakota, Tennessee, Texas, Utah, Virginia, West Virginia and Wyoming. For conduct occurring in those states, please refer to the Policy effective August 2020, available at: [https://www.waldenu.edu/-/media/walden/files/legal/walden university-title-ix-policy-revisions-final-102020.pdf](https://www.waldenu.edu/-/media/walden/files/legal/walden%20university-title-ix-policy-revisions-final-102020.pdf)
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14. Initiate and participate in an appeal process; and
 15. Waive any of the rights contained herein.

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/dps/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
Phone: (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

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

Phone Number: 515-725-6050

KANSASWebsite: [Public Offender Registry \(ks.gov\)](http://www.kansas.gov/public-offender-registry)

Phone Number: 785-296-2841

KENTUCKYWebsite: <http://kpsor.state.ky.us/>

Phone Number: 502-227-8700

LOUISIANAWebsite: [Louisiana State Police \(icrimewatch.net\)](http://www.louisianapolice.com/ictimewatch)

Phone Number: 800-858-0551

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

Phone Number: 207-624-7270

MARYLANDWebsite: [DPSCS - Sex Offender Registry \(state.md.us\)](http://www.dps.state.md.us/sex-offender-registry)

Phone Number: 410-585-3600

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

Phone Number: 978-740-6400

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

Phone Number: 517-241-1806

MINNESOTAWebsite: <http://coms.doc.state.mn.us/PublicViewer/>

Phone Number: 651-361-7200

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

Phone Number: 601-987-1540

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

Phone Number: 888-767-6747

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

Phone Number: 406-444-7068

NEBRASKAWebsite: <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=aHR0cDovL2NvbW11bml0eW5vdGlmaWNhdGlubi5jb20vY2FwX21haW4ucGhwP29mZmljZT01NTI5MA==

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: [Search - Virginia State Police \(vspsor.com\)](#) 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: https://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: [Federal Trafficking Penalties Chart 6-23-22.pdf \(campusdrugprevention.gov\)](#) . 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: [Diversion Control Division | Controlled Substance Schedules \(usdoj.gov\)](http://www.usdoj.gov/diversion-control/controlled-substances-schedules)).

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 [Guidance Resources](#), 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.
- **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.
- **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.
3. **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.

Please note that while not produced by a person, the paraphrasing or use of direct material produced by an artificial intelligence (AI) tool, such as ChatGPT, also requires proper citation. While the use of such tools itself are not considered plagiarism or a violation of academic integrity, the use of proper citation and

acknowledgment still applies for any content that is not a student's original idea or synthesis. Walden reserves the right to require AI input/output transcripts for review in an assignment reference list/appendix. For more information regarding the use of artificial intelligence in scholarly writing, [please visit Walden's Artificial Intelligence resource page.](#)

Students' Use of Their Own Scholarly Work

- Students may reuse their work without an expectation that previously awarded grades or credit will attach to the new assignment. Any work previously published by the student must be appropriately cited if reused.
- **Field Experience Exception:** Any assignments or documentation submitted related to field experience (work, hours, client or patient logs, etc) must be new, current, accurate, and relate to clients or patients seen during the term and in direct reference to the assignment.

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;
- 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: https://che.sc.gov/sites/che/files/Documents/Institutions%20and%20Educators/Licensing/Student_Complaint_Procedures_and_Form_09192022.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 <https://www.highered.texas.gov/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.

ANTI-HAZING POLICY

Purpose

This policy defines the requirements for providing a safe and secure environment for students at Adtalem Global Education Inc.’s (“Adtalem’s”) institutions of higher education.

Adtalem institutions prohibit hazing (as defined below) committed against students as part of their education programs or activities.

Adtalem reserves the right to make changes to this policy as necessary, and once those changes are posted online, they are in effect. If laws, regulations, or court decisions change requirements in a way that affects this policy, the policy will be construed to comply with the most recent laws, regulations or court decisions.

Policy

No colleague, consultant, alumnus, volunteer, or student organization shall permit the hazing of a student. Nor shall any student, student organization, colleague, consultant, alumnus, or volunteer participate in the hazing of a student, including when the hazing involves coerced consumption of alcohol or drugs, or of abuse resulting in serious physical harm to the student.

Procedure for reporting hazing

A student that has experienced or witnessed hazing is strongly encouraged to notify an administrator as soon as possible after the incident. Students have the option to notify law enforcement directly or be assisted in doing so.

Employees, consultants, alumnae, volunteers, and student organizations who have witnessed hazing of a student are required to notify an administrator as soon as possible after the incident. Depending on the nature of the incident, it may be appropriate for the administrator to notify law enforcement.

Students and colleagues can make anonymous reports of instances of hazing through speakupadtalem.com, by calling 1.800.461.9330 or text 1.773.904.1074. The information you provide will be sent to Adtalem. Your confidential report will be reviewed, investigated, and acted upon to the best of our ability. If you provide an email address you will also receive email notifications as the report status is updated. Please provide as much detail as you can. An Adtalem colleague will be able to communicate with you anonymously through asynchronous chat in this system. We will not tolerate your being treated differently for reporting an issue, cooperating in an investigation, or filing an administrative complaint with any federal, or state governmental agency.

Investigation and Processing of Complaints

Adtalem will investigate complaints that a student has been subject to hazing. A complaint against a student for hazing will be addressed under the Student Code of Conduct policy and processes of the Adtalem institution at which the student is enrolled.

A complaint against a colleague for hazing will be referred to Human Resources and addressed under the appropriate Colleague conduct policies and procedures.

Hazing awareness and prevention programs

Adtalem’s primary hazing prevention and awareness programming will include a comprehensive education platform available and recommended for viewing by all students and colleagues, as well as student-facing vendors if necessary and appropriate. Access to the primary hazing prevention and awareness programming will be ongoing throughout the participant’s relationship with Adtalem institutions. Members of the community are encouraged to visit this resource regularly for personal, professional, and academic purposes.

Definitions

Hazing: The term “hazing”, means any intentional, knowing, or reckless act committed by a person (whether individually or in concert with other persons) against another person or persons regardless of the willingness of such other person or persons to participate, that— (I) is committed in the course of an initiation into, an affiliation with, or the maintenance of membership in, a student organization; and (II) causes or creates a risk, above the reasonable risk encountered in the course of participation in the institution of higher education or the organization (such as the physical preparation necessary for participation in an athletic team), of physical or psychological injury including— (aa) whipping, beating, striking, electronic shocking, placing of a harmful substance on someone’s body, or similar activity; (bb) causing, coercing, or otherwise inducing sleep deprivation, exposure to the elements, confinement in a small space, extreme calisthenics, or other similar activity; (cc) causing, coercing, or otherwise inducing another person to consume food, liquid, alcohol, drugs, or other substances; (dd) causing, coercing, or otherwise inducing another person to perform sexual acts; (ee) any activity that places another person in reasonable fear of bodily harm through the use of threatening words or conduct; (ff) any activity against another person that includes a criminal violation of local, State, Tribal, or Federal law; and (gg) any activity that induces, causes, or requires another person to perform a duty or task that involves a criminal violation of local, State, Tribal, or Federal law.

Student Organization- The term ‘student organization means an organization at an Adtalem institution of higher education (such as a club, society, association, varsity or junior varsity athletic team, club sports team, fraternity, sorority, band, or student government) in which two or more of the members are students enrolled at the institution of higher education, whether or not the organization is established or recognized by the institution.

Local, State and Tribal Laws on Hazing

Applicable local, State, and Tribal laws on hazing can be found [here](#).

Resources & Tools

["Stop Campus Hazing Act"- Public Law 118-173 118th Congress](#)

[Walden Nonharassment and Anti-Hazing Training - Walden Nonharassment and Anti-Hazing Training | Rise 360](#)

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 <https://www.eac.gov/voters/register-and-vote-in-your-state> 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/>

COLLEAGUE CODE OF CONDUCT



ADT▲**LEM**
GLOBAL EDUCATION

Code of Conduct and Ethics

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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 Help Site or Help Line.

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 required 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:

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- 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, bullying 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 Help Site.

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 Help Site.

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 they understand your question or concerns.
- Contact Integrity and Compliance.

CODE OF CONDUCT AND ETHICS

- Contact a member of the Adtalem Legal team, your local Human Resources representative or askHR.
- Go to the Speak Up Help Site or Help Line 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 Help Site.

What to Expect When You Use Our Speak Up Resources

The Speak Up resources, the Help Site and Help Line noted below, are a confidential way to obtain answers to your questions and concerns and to report possible misconduct. The Help Site and Help Line 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 Help Site and Help Line, 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.

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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?

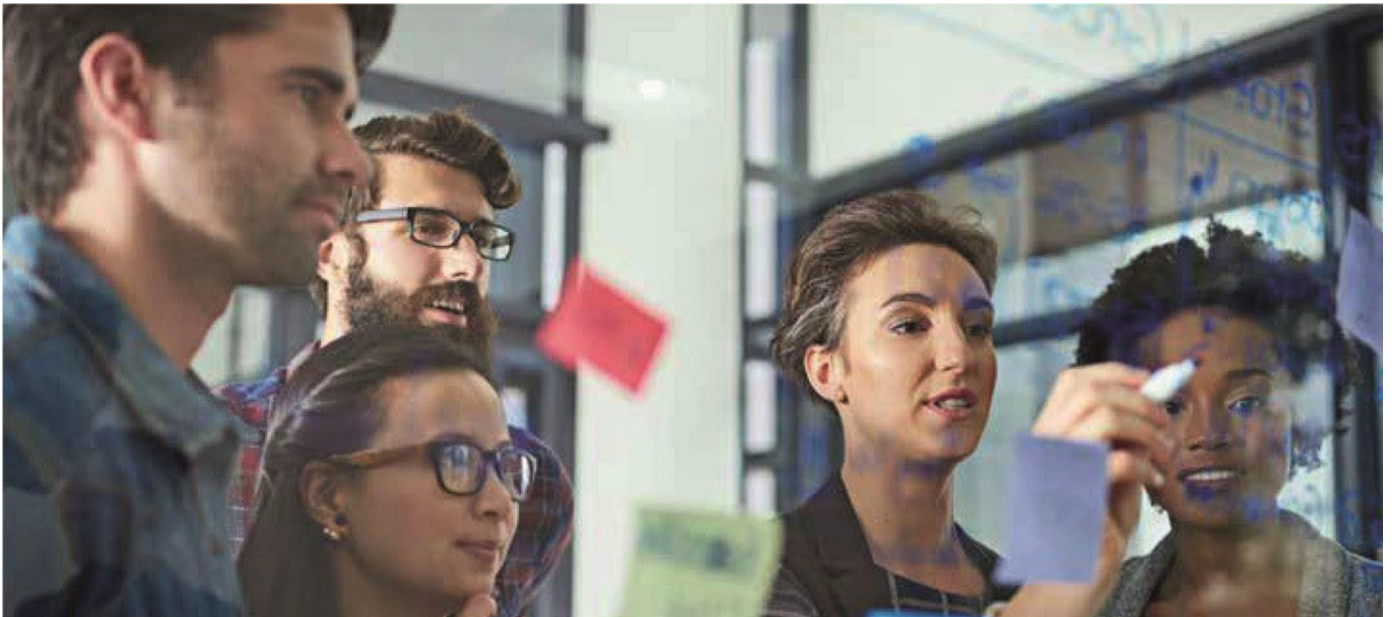
If your answer is “no” and you believe more should be done, contact Integrity and Compliance. Your suggestions will help us improve our Integrity and Compliance program.

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



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 Equal Opportunity

We value the unique contribution that each person brings to Adtalem. We treat everyone with respect

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.

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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 Help Line or Help Site. 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, Bullying and Intimidation

We treat our fellow colleagues with dignity and respect at all times. We do not tolerate any form of harassment, bullying 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, bullying and intimidation.
- 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 Help Line or Help Site.
- 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, bullying and intimidation 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 Help Line or Help Site 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

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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 Help Site or Help Line.

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 Help Line or Help Site.

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 Help Line or Help Site.

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

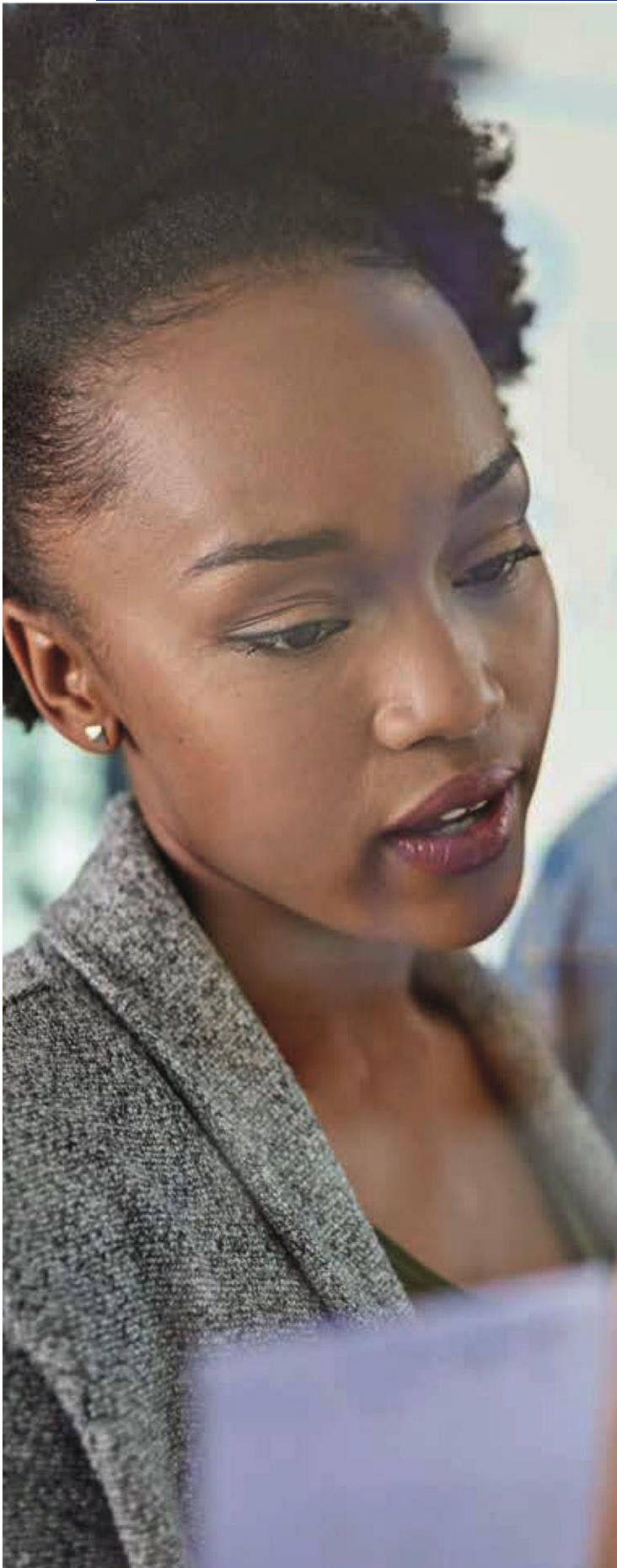
Where that is the case, the stricter standards prevail. For more information, or if you have questions, contact the head of academic affairs for your institution, askHR or your local HR representative, or use the Speak Up Help Line or Help Site.

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 workstations, 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.

CODE OF CONDUCT AND ETHICS

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 Adtalem 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

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 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 Help Line or Help Site.
- 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.



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 our

CODE OF CONDUCT AND ETHICS

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. “unethically, it can expose us to legal repercussions and/or damage our reputation.

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.



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

- 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.

CODE OF CONDUCT AND ETHICS



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

- Report any potential or actual data security breach to your manager, Integrity & Compliance/Privacy, the Cyber Security Team or our Chief Information Security Officer.

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, prospective students, and alumni. Depending on the situation, this can include marketing insights, strategic ideas, organizational plans, student records and other types of personal 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.

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 or 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

CODE OF CONDUCT AND ETHICS

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 Help Site or Help Line.

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.

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 as 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.

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

CODE OF CONDUCT AND ETHICS

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

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

CODE OF CONDUCT AND ETHICS

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 marcommreview@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 Global Communications and Corporate Affairs 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 and our institutions operate, and penalties can be

CODE OF CONDUCT AND ETHICS

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 Gifts and Entertainment Policy, Adtalem Global Education's Colleague Handbook, "Gift Restrictions" section Adtalem Global

Q&A

I have questions about the use of third parties who may be go- between 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.

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:
 - 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 or institution 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 Integrity & Compliance Team in Legal and the Government Relations organization before providing any gifts or entertainment to public officials or hosting an event that will be attended by public officials.

CODE OF CONDUCT AND ETHICS

- 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.
- Be alert to efforts to receive, transfer, transport, retain, use, divert or hide the proceeds of any criminal activity.

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, Integrity & Compliance, 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, Integrity & Compliance, or Adtalem’s Government Relations organization. If you need more information, you should review Adtalem Global Education’s Colleague Handbook, “No Solicitation Policy” section.

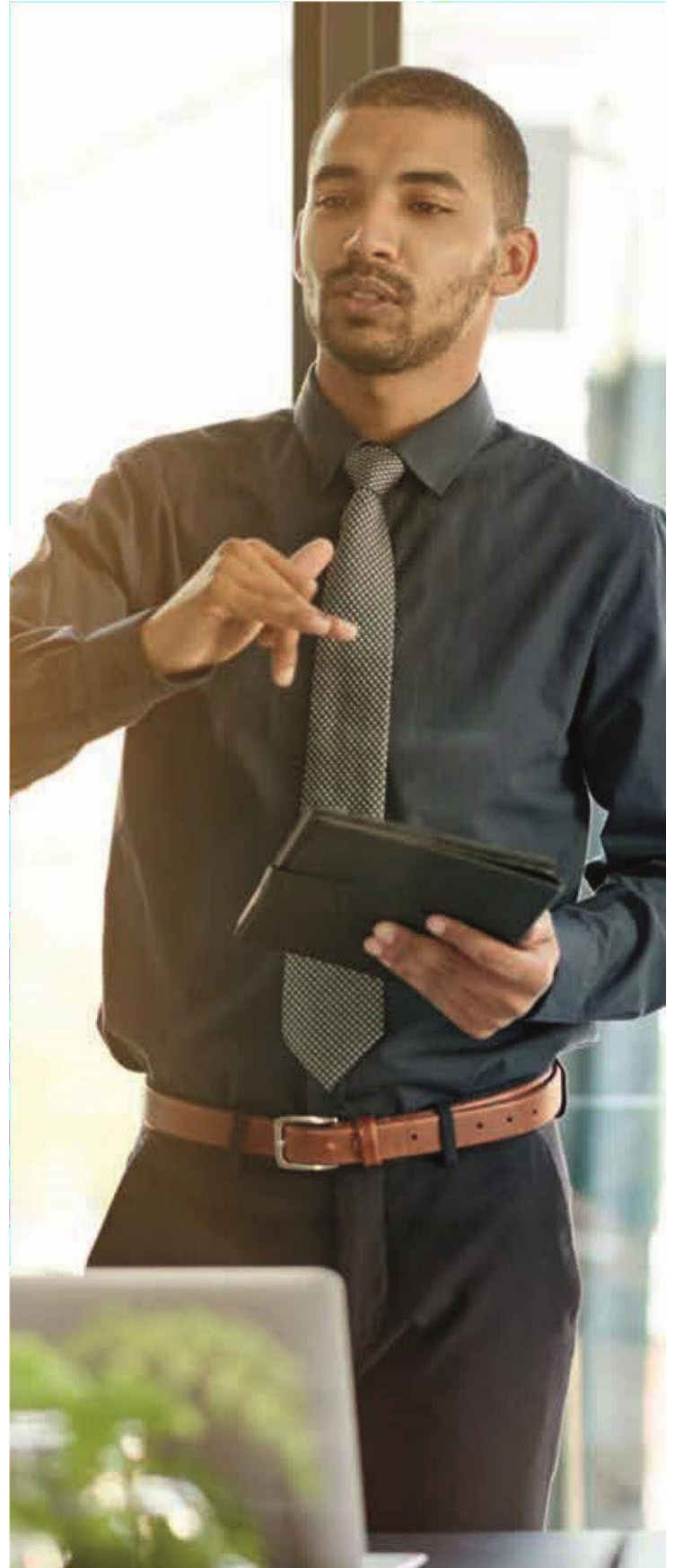
Operate Globally with Integrity

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 the Integrity & Compliance Team in Legal or another member of the legal team 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.



- 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 an 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 or bullying for a colleague's reporting or participating in a related investigation of conduct that potentially or actually violates this Code.

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GLOBAL EDUCATION

WALDEN UNIVERSITY - ANNUAL CAMPUS CRIME STATISTICS
**Reported in accordance with Uniform Crime Reporting procedures and the
 Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act**

Total Crimes Reported for:	On Campus			Public Property		
	2022	2023	2024	2022	2023	2024
<u>Criminal Offenses (includes attempts)</u>						
Murder/Non-negligent manslaughter	0	0	0	0	0	0
Negligent manslaughter	0	0	0	0	0	0
Sexual Assault-Rape	0	0	0	0	0	0
Sexual Assault-Fondling	0	0	0	0	0	0
Sexual Assault-Incest	0	0	0	0	0	0
Sexual Assault-Statutory rape	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Aggravated assault	0	0	0	0	0	0
Burglary	0	0	0	0	0	0
Motor vehicle theft	0	0	0	0	0	0
Arson	0	0	0	0	0	0
<u>HATE CRIMES</u>						
2022	2023	2024	2022	2023	2024	
If there are any hate crimes to report, please enter count here and narrative description below.						
0	0	0	0	0	0	0
<u>VAWA Offenses</u>						
2022	2023	2024	2022	2023	2024	
Domestic Violence	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0
Stalking	0	0	0	0	0	0
<u>Arrests</u>						
2022	2023	2024	2022	2023	2024	
Weapons: carrying, possession, etc.	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0
<u>Referral for Disciplinary Actions</u>						
2022	2023	2024	2022	2023	2024	
Weapons: carrying, possession, etc.	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0
<u>Hate Crimes</u>						
Prejudice Categories:						
Race, Religion						
Sexual Orientation						

Gender, Gender Identity			
Disability			
Ethnicity			
National Origin			
On campus or public property:	2022	2023	2024
Total Unfounded Crimes	0	0	0