



2018 CODE OF ETHICS

WE RISE



University of Phoenix®



A Message from the President

Since its founding, University of Phoenix has been a leader of innovation in higher education and led by a student-centric focus; to provide access to higher education opportunities that enable students to develop knowledge and skills necessary to achieve their professional goals, improve the performance of their organizations, and provide leadership and service to their communities.

As we execute on our mission, our reputation has been built and bolstered by a University-wide commitment to high ethical standards of conduct—a commitment we are proud to reaffirm with the publication of this University Code of Ethics.

I believe the ideals expressed throughout this Code of Ethics are deeply ingrained in our institution and inherent in our vision to be recognized as the most trusted provider of career-relevant higher education for working adults. For us to become the most trusted institution in our field, we must execute our work with a focus on credibility, accountability and compliance.

Furthermore, I believe the ideals expressed in this Code of Ethics are required for any institution in higher education that seeks long term success in serving students. For our University to attract and retain talented staff, and for it to enroll and graduate determined students, we must demonstrate on a daily basis our belief in quality and integrity.

A Code of Ethics is not a goal to be reached, but rather a promise to be kept by every one of us—an expectation to be met every day. In coordination with the recently articulated Core Values (Brave, Honest, Focused), it defines who we are, what we do and particularly how we act.

I am proud to say with confidence that our institution is doing an exemplary job of living up to the high standards we have set with this Code of Ethics. I am also confident that through candor, accountability and open communication, we will always work in good faith to correct ourselves whenever we fall short of these expectations.

It is with that confidence in mind that we take this Code of Ethics to heart and declare that University of Phoenix will share and showcase these principles through the way we conduct ourselves and serve our students.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Cohen". The signature is fluid and cursive, with the first name "Peter" being more prominent than the last name "Cohen".

Peter Cohen

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Ethics at University of Phoenix

Our Purpose

- To facilitate cognitive and affective student learning – knowledge, skills and values – and to promote use of that knowledge in the student’s workplace
- To develop competence in communication, critical thinking, collaboration and information utilization, together with a commitment to lifelong learning, for enhancement of students’ opportunities for career success
- To provide instruction that bridges the gap between theory and practice through faculty members who bring to their classroom not only advanced academic preparation, but also the skills that come from the current practice of their professions
- To provide general education and foundational instruction and services that prepare students to engage in a variety of university curricula
- To use technology to create effective modes and means of instruction that expand access to learning resources and that enhance collaboration and communication for improved student learning
- To assess student learning and use assessment data to improve the teaching/ learning system, curriculum, instruction, learning resources, counseling and student services
- To be organized as a private institution to foster a spirit of innovation that focuses on providing academic quality, service, excellence and convenience to the working student
- To generate the financial resources necessary to support the University’s mission

Our Mission Statement

University of Phoenix provides access to higher education opportunities that enable students to develop knowledge and skills necessary to achieve their professional goals, improve the performance of their organizations, and provide leadership and service to their communities.

Our Vision

To be recognized as the most trusted provider of career-relevant higher education for working adults

Our Core Values and Culture

In the service of our mission, we embody our Core Values, which state that we are:

Brave

Greatness doesn't come from being comfortable. John Sperling knew that. When he saw that traditional college classes were out of reach for working adults, he dared to hold classes online and at night. To move the University forward, we need to channel that spirit of bravery by saying what needs to be said, challenging the way it's been done and having the courage to try new things.

Honest

To be the most trusted provider of higher education for working adults, we must show an unparalleled level of transparency. That means being honest with students, alumni, employers and, most importantly, each other — even when it's hard. We keep our word and follow through on promises. Together, we acknowledge our failures, learn from them and pivot quickly.

Focused

If we want to be known for what we do, we must do it better than anyone else. That can only happen when we center everything on our students, work on initiatives that support their needs, reduce complexity and do fewer things better. Because quality over quantity is more than a mantra — it's our way forward.

Our Ethical Principles

- We conduct ourselves with honesty, integrity and the highest ethical standards.
- We encourage each other to grow and excel by creating a workplace that's the job of choice.
- We seek out and embrace diversity and inclusion – valuing differences in people, perspectives and experiences.
- We invest in ourselves and the University through our individual and collective dedication.
- We contribute to the communities in which we work and live by being good global, corporate and individual citizens.
- We honor our commitments and promises; we do not promise what we cannot deliver.
- We do not misrepresent to anyone who we are, what we do or what services we provide.
- We abide by and comply with the laws, regulations and rules that govern us wherever we operate in the world.
- We will not sacrifice our values or our goals for the “quick win”; we are focused on building long-term success, stability and excellence.
- We believe the way we do business is as important as the business results we achieve.
- We celebrate and reward our successes, and encourage and support each other.
- We are committed to providing world-class service to our students, customers, partners, shareholders and each other.

Our Approach to Ethical Decision-Making

When making decisions and in our daily work, we consider our mission, core values, obligations and these best practices:

- Clearly identify the issue or concern.
- Gather all relevant facts.
- Review our core values, this Code and University of Phoenix® policies on the matter.
- Consider who is impacted by the decision or action.
- Reflect on how these parties are affected.
- Look at each available option and consider whether each one is balanced and fair, and whether anyone is harmed by the potential outcome.
- Consult with experts on the issue.
- Consider what an ethical person would do or think if they learned about the activity or decision or saw it on the news.
- Use good judgment.

Asking Questions or Reporting Concerns

University of Phoenix is committed to supplying resources that assist employees in understanding their compliance obligations and providing coaching and guidance on ethical issues that may arise. The University provides training regarding these key topics through resources such as UOPX Learning Services and UOPX Ethics and Compliance. These departments have information related to their training programs and offerings on their internal websites.

Oftentimes, your manager or supervisor is the best person to contact regarding your questions. If there is any reason to believe there has been a violation of our Code, University policy, or a law or regulation, or if an individual has witnessed what is believed to be illegal or unethical behavior in our workplace, employees have a responsibility to report this promptly.

Our helpline calls are answered by third-party professionals. You may choose to report anonymously. If you choose to make an anonymous report, please provide as much detail as possible in your report, as we will not be able to contact you for follow-up.

As required by federal law, concerns regarding auditing, internal controls or accounting irregularities must be reported directly to UOPX Ethics and Compliance or the helpline, irrespective of their source or materiality, who shall investigate such concerns and, as appropriate, forward them to the University's board of trustees.

Failure to report a violation is itself a violation of this Code. Nothing in this Code is intended to discourage reporting any illegal activity – including a violation of any Department of Education regulation or antitrust law or any other federal, state or foreign law, rule or regulation – to the appropriate regulatory or legal authority. The University will maintain the confidentiality and protect the identity of any complainant to the maximum extent possible. This means the University will not disclose the identity of the individual reporting the concern or allegation unless it is determined during the investigation that such disclosure is unavoidable or that the University is required by law to disclose the information.

Employees cannot be discharged, demoted, suspended, threatened, harassed or in any other manner discriminated or retaliated against for reporting a violation. Likewise, employees cannot discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against those who report a violation. If employees knowingly submit a false report of a violation, they will be subject to disciplinary action.

Reporting Concerns

- Contact your manager or supervisor.
- Contact the Ethics Helpline. The helpline is available 24 hours a day, seven days a week at **888.310.9569** or www.uopxhelpline.com.
- Contact Human Resources.
- Contact UOPX Ethics and Compliance at Office.ComplianceUOPX@phoenix.edu

What happens when I call the helpline?

Your report will be appropriately reviewed. You may call or check back online at any time to add information to your report or to check for any questions seeking additional information from you.

Reports to the helpline will be treated confidentially to the maximum extent possible. According to University policies, a person who reports illegal or unethical behavior will be protected from retaliation. The University will ensure reports of retaliation are thoroughly and promptly reviewed.

When calling the helpline, please provide as much information as possible, including:

- Circumstances of the incident noted (names, dates, times, places)
- Campus, department and individuals involved
- Location of any available evidence (physical evidence or records)
- Names and telephone numbers of witnesses
- Your name and telephone number, if you choose not to remain anonymous

Commitments

University of Phoenix Governance

The University of Phoenix board of trustees is highly engaged and focused on the core governance principles of ethical leadership, board independence, oversight and accountability.

The board is responsible for providing oversight of management performance at University of Phoenix and acting in the best interests of the University and our stakeholders.

University leaders have a special position of trust in the company; leaders are expected to model our core values, mentor others and further a culture of ethical conduct in the workplace through their words and actions. University leadership and administration are responsible for establishing an appropriate system of internal controls to ensure process efficiency, accuracy, and timeliness of company transactions and financial information. They are also responsible for ensuring all University employees understand their obligation to comply with laws and regulations and to prevent fraud and abuse of University resources. Additionally, our leadership is responsible for understanding the risks to us and our stakeholders and taking necessary action to mitigate these risks. To carry out these responsibilities, University leadership, with the approval of the board, has established the University Ethics and Compliance department.

Applicability and Authority

The University's board has adopted and approved this Code for all employees of University of Phoenix and is bound by it as well. Additionally, any outside consultants, contractors, vendors and agents hired by the University are expected to abide by the principles and values set forth in this Code when performing services on behalf of the University. The University has also implemented and administers a Faculty Code of Conduct and a Student Code of Conduct.

Promoting the Code

Examples of ways you can demonstrate and promote our ethical values include:

- Ensure any advice given to a student, prospective student, faculty member, supplier or others is correct, legal, timely and complete.
- Assist your peers, our students and our faculty in understanding our ethical values by modeling our Core Values and this Code of Ethics, as well as our Student and Faculty Codes of Conduct.

COMMITMENTS

Enforcement

If the University receives information regarding an alleged violation of this Code, it will take prompt action to evaluate the information and determine whether it is necessary to conduct an informal inquiry or a formal investigation and, if so, initiate an inquiry or investigation. Violations of this Code may result in disciplinary action up to and including termination of employment, as well as referral to law enforcement, as appropriate.

It is the University's expectation that individuals who report concerns do so in good faith. Making a report in good faith means the information being reported is true to the best of the individual's knowledge and includes information the person reporting considers relevant.

Investigations and Audits

The University expects individuals to act with integrity when they raise concerns, as well as when concerns are reviewed and considered. Therefore, retaliation against anyone who participates in an investigation, inquiry or audit is prohibited. Such retaliation may lead to disciplinary action against the person, up to and including termination of employment. To report retaliation, refer to the "Asking Questions or Reporting Concerns" section within this Code.

Employees are expected to cooperate fully and provide accurate, timely and complete information when involved in a discussion, audit, or a reporting or disclosure process with an internal or external auditor or investigator, law enforcement personnel or regulator. Failure to cooperate in an audit or investigation may lead to disciplinary action, up to and including termination.

In the event of a government investigation or audit, employees should contact the University Legal Services regarding any additional procedures that may apply, including record preservation holds and similar protocols.

Personal Responsibility

Conflicts of Interest and Corporate Opportunities

Community members who are University of Phoenix employees owe their primary professional allegiance to the University and support its mission, as previously stated. Outside professional activities, private financial interest or the receipt of benefits from third parties can cause an actual or perceived divergence between the University mission and an individual's private interest. To protect our mission, we expect community members with other professional or financial interests will disclose them in compliance with the University Conflict of Interest policy.

A conflict of interest could occur when:

- Personal interests conflict with the interests of the University.
- Personal interests interfere or could interfere with the performance of duties.
- Employees may not be effective or objective in their University duties due to personal interests.
- Employees use University information, assets or their position or influence at the University for personal gain.
- An employee's outside employment or the employment of an immediate family member creates a conflict of interest or the appearance of a conflict of interest.
- There is the appearance of a conflict of interest.

Outside Employment and Board Service

University of Phoenix expects each employee's loyalty is to the University and that any outside employment opportunities do not interfere or conflict with that commitment, including the use of University time, resources or assets. External work opportunities may present issues and situations that could be a conflict of interest. Additional opportunities that may create conflicts include serving as an executive or director of another company or entity.

Seeking assistance

Conflicts, potential conflicts and business opportunities encountered through the course of an employee's work or position must be disclosed for review and advice. The review of these issues will be facilitated by the UOPX Ethics and Compliance team, who will advise on the potential conflict of interest, appropriate resolution and expectation. External or additional work opportunities must be disclosed in the same manner as other potential conflicts of interest for review in advance of accepting a position. Additional information on conflicts of interest, outside employment and boards of directors, as well as the conflict of interest disclosure form, may be found on the UOPX Ethics and Compliance internal website. The University will also distribute periodic questionnaires related to conflicts of interest.

Ethical Dilemma

Q: I am a full-time nursing faculty member at University of Phoenix and was recently asked to serve on the board of another university in our sector. Although I would not be serving on this other board on behalf of University of Phoenix, I think this activity would be beneficial to the University and myself. Is this allowed?

A: Although University of Phoenix encourages employees to actively participate in personal service on community and professional boards, there may be instances when your personal board service may conflict with the interests of the University. For that reason, employees who serve or are considering serving on boards of other organizations should disclose this information in advance for review by Ethics and Compliance.

PERSONAL RESPONSIBILITY

Communications with Fellow Employees, Students, the Public and Others

In the academic, classroom and social environments, each of us acts as a representative of the University. Employees are expected to demonstrate our values, professionalism and discretion in these interactions. This means we are fair, honest and thoughtful in all of our professional activities and communications. We are transparent regarding our operations, compliant with the rules that govern us and committed to our students. We are thoroughly familiar with the University's policies relating to our individual areas of responsibility, such as admissions, financial aid, graduation criteria, academic standards and educational methods.

Our Public and Media Relations and Social Networking policies provide that only specifically authorized personnel may act as University spokespersons. These policies are designed to protect our employees and to ensure our communications with our stakeholders and the public are accurate and consistent. Individuals who receive a request for information from outside the University, and are not authorized to speak on behalf of the University, should forward the request to UOPX Ethics and Compliance and the Public Relations team. Additionally, before publishing, making a speech, giving an interview or presenting at a conference, employees should contact UOPX Ethics and Compliance for guidance.

Individuals who participate in social networking activities are expected to demonstrate our mission, ethical principles and core values. They must follow all relevant company policies, guidelines and standards, including our Information Security, Privacy, Public Relations, Human Resources and Intellectual Property policies.

Use of University of Phoenix Resources

We are expected by our students and other stakeholders to safeguard and use University resources wisely. We exercise good judgment and discretion when using University resources, including, but not limited to, University systems, computers, telephones, internet access, email, voicemail, copiers, fax machines, vehicles, or other funds or property. We should conserve University resources and look for appropriate savings opportunities; this includes the use of resources when traveling on behalf of the University.

Minor, incidental and infrequent personal use of University resources is sometimes inevitable and allowed if the cost to the University is insignificant and the use does not deplete the value of our assets, interfere with productivity, or create risk or liability to the University.

Find More Information

For additional information related to our Public and Media Relations, Social Networking, acceptable use of IT assets or other corporate policies, refer to the [Policy Library](#) located on the UOPX Ethics and Compliance internal website. If there are any questions related to appropriate actions or communications, contact UOPX Ethics and Compliance at [Office.ComplianceUOPX@phoenix.edu](#).

Ethical Dilemma

Q: My student's personal computer crashed. He has asked me to log on to his student website in order to post a class assignment for him. Is it acceptable for me to submit the assignment on his behalf using his login and password?

A: No! It's never acceptable to use or request a student's password or login information for any reason. Students are required to protect their password so only they can access the classroom and post information. In this instance, tell the student to speak with the instructor about the issue and discuss alternative methods for ensuring the instructor receives the student's assignment.

PERSONAL RESPONSIBILITY

Gifts and Entertainment

Employees who give or receive business gifts or favors, or provide or accept entertainment, should do so only when these activities are in accordance with the Gifts and Entertainment policy, are approved and appropriate, and do not create an expectation or inference of an obligation. We must not offer, provide, solicit or accept any gifts, favors or entertainment that may be intended, considered or construed as a bribe. Any gifts inconsistent with these principles or our Gifts and Entertainment policy should be returned, reported or transferred in the manner described in that policy. Individuals who have any questions regarding gifts and entertainment should contact UOPX Ethics and Compliance.

Employees may not use University funds or assets to give gifts, favors, entertainment or services to our suppliers, customers, vendors, government officials or government employees. Nor may gifts be offered or accepted from potential or active students without the advance approval of the Operations Compliance Committee.

As discussed in the Gifts and Entertainment policy, there are different considerations based on who is giving the gift and who is receiving the gift (e.g., students, employees, vendors). Therefore, it is important to review the Gifts and Entertainment policy prior to offering, giving or accepting any gift, entertainment or favor. This policy is located in the Policy Library on the UOPX Ethics and Compliance internal website. Please refer to the “Educational Loans and Student Loan Providers” section of this Code for additional guidelines related to gifts and entertainment.

Educational Loans and Student Loan Providers

Employees, their spouses or domestic partners, or their immediate family members may not give or receive gifts, gratuities, entertainment or other favors of any value to or from any current or prospective student loan providers in connection with the University or its business.

Employees who are involved in contractor selection, purchasing or related approval processes concerning educational loans or student loan providers should refer to the “Sourcing Integrity, False Claims and Government Contracts” section within this Code for additional information regarding these topics.

Ethical Dilemma

Q: I manage a team of enrollment representatives who provide exceptional customer service. It's not uncommon for them to receive gift cards from grateful students. Our Gifts and Entertainment policy says our employees generally may not accept gifts from students or customers, but I'm curious ... why not?

A: Our goal is to always provide world-class service to our students and customers. Accepting a gift for doing what's expected is not right, and certainly not the way we do business. Additionally, others may perceive the gift as a request for a favor or preferred service, or it may even be misconstrued as a bribe. Let your team know you appreciate and value their hard work and efforts, but that when it comes to gifts, the right thing is to thank the student and politely decline the gift.

Find More Information

As UOPX receives funding pursuant to Title IV of the United States Higher Education Opportunity Act, as amended, all University staff, as well as other employees, who perform functions related to the administration of these funds are required to comply with the **University's Student Loan Code of Conduct**, this Code and related policies. These policies and resources are available through the UOPX Ethics and Compliance internal website.

Honesty

Fair Dealing

We are fair and honest in all of our business dealings and do not misrepresent who we are, what we do or what services we provide. We empower excellence by providing unparalleled support and quality service. We honor our promises and ensure we fulfill our obligations to others. We act with accountability in everything we do.

We do not insult or disparage others, including our competitors and colleagues. To meet these standards, University of Phoenix takes a comprehensive approach to compliance and has put processes in place to prevent, detect and respond to any action or activity that is fraudulent, illegal or unethical.

We do not engage in any of the following behaviors and will not tolerate them when used against us:

- Dishonest acts
- Deceptive acts
- Embezzlement
- Forgery or alterations of negotiable instruments or other documents
- Unauthorized handling or reporting of company transactions
- Falsification of company records, student records or financial statements
- Misrepresentation through false, erroneous or misleading statements, or omissions of important facts in advertisements, promotions, marketing of courses, or programs of instruction, public disclosures, regulatory or legal filings, and reports or other communications and documents
- Taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair practice

Reporting Concerns

To report any activity that is fraudulent, illegal or unethical, contact the Ethics Helpline at **888.310.9569** or www.uopxhelpline.com.

Disclosures by University of Phoenix

We are committed to fair, accurate, complete and timely filings with the U.S. Department of Education, state agencies, accreditors and other regulators, and keeping applicable parties appropriately informed. To ensure the accuracy of our disclosures, only authorized employees can make disclosures to the public or speak on behalf of University of Phoenix.

Authorized employees involved in the University's disclosure process must:

- Be familiar with our disclosure requirements and all University operations.
- Accurately represent and ensure others accurately represent, as applicable, information about the University.
- Properly review and analyze proposed disclosures for accuracy and completeness.

Corporate Citizenship

Charitable Contributions

We believe in giving back to the communities where we live, work and serve. Through our University Mission and work, our foundations, and our commitment of time, money and assets to charities, we strengthen our communities and improve society. We contribute to many causes, including those focused on providing access to education, serving historically underserved populations, promoting sustainable business practices and supporting those who protect and defend us. We help improve society by expanding access to both quality education and safe, healthy environments where everyone can learn, explore and grow personally and professionally.

Employees may choose to contribute and participate in the University's charitable works and projects, or may participate via private giving choices. However, University resources and assets may not be used in support of personal charitable activities and may not be committed to charitable works that are not approved by the University.

Sustainability

With both physical facilities and online classrooms, we strive to conduct our operations and deliver education in an environmentally responsible manner. We are committed to complying with all applicable environmental laws and regulations, and to be environmentally responsible. Our goals are to prevent pollution, minimize waste, lower our carbon footprint, reduce greenhouse gas emissions, and conserve energy and natural resources.

To implement these goals, we seek to engage in sustainable business practices, including, where feasible and possible:

- Purchase of environmentally preferable supplies and services from environmentally responsible suppliers and contractors
- Energy efficiency
- Water conservation
- Recycling, reuse, use of recycled materials and use of materials from sustainable sources
- Carpooling and telecommuting
- Environmentally related employee education and involvement
- Public availability of information about our environmental actions, including our environmental objectives and performance, this Code and an annual inventory of our domestic greenhouse gas emissions

We also strive to promote environmental stewardship through our philanthropy and sustainability-related degree programs.

Find More Information

Questions regarding these matters should be discussed with the University's External Affairs Department. The Policy Library, located on the UOPX Ethics and Compliance internal website, contains our policy on Corporate Giving and Volunteerism.

Compliance

U.S. Department of Education Regulations

We are subject to many education-related laws and regulations, including Title IV of the U.S. Higher Education Act of 1965, as periodically amended and reauthorized. Title IV and associated laws and regulations are administered by the U.S. Department of Education. The University is directly and specifically committed to maintaining compliance with these and other applicable laws and regulations. The University employs legal experts and professionals with expertise concerning these laws and regulations. Employees should not attempt to interpret the University's responsibilities related to these obligations without consulting our experts in this area.

Depending on the nature of their positions, employees will be informed of actions that may need to be taken and processes that apply to them to ensure our compliance.

Sourcing Integrity, False Claims and Government Contracts

We place great emphasis on conducting our strategic sourcing practices in a fair, ethical and transparent manner. We engage strategic suppliers who share our values and, like us, want to build strong and lasting strategic relationships. We expect our contractual partners (consultants, contractors, vendors and third parties) to share our values and principles of ethical behavior.

We expect employees involved in contractor selection, purchasing or related approval processes will act with objectivity, integrity and care, consistent with our procurement policies, procedures and, when applicable, the U.S. Procurement Integrity Act relating to government contracts.

We are always truthful and avoid false claims or statements to our students, business partners, subcontractors and vendors. We do not submit false claims to any party, including the U.S. government, for payment or approval, make or deliver a false receipt for government property, or knowingly buy property from a person who is not authorized to sell such property.

We adhere to the provisions of the Truth in Negotiations Act when engaged in transactions involving the U.S. government. We ensure cost and pricing information is accurate, complete, appropriately disclosed and retained.

Employees involved in proposal preparation, contract negotiations and contract performance, including those related to government work, must exercise great care and maintain the highest ethical standards in all communications and activities.

Find More Information

For additional information related to procurement or government contract compliance, refer to the **Policy Library** located on the UOPX Ethics and Compliance internal website. Additionally, the Strategic Sourcing and Procurement Department maintains specific procedures governing the procurement process that apply to employees engaged in these processes. For additional information, refer to the **Strategic Sourcing** and Procurement internal website.

COMPLIANCE

Anti-Bribery and Anti-Corruption

We believe in competing for and winning business legally and ethically. If we cannot compete and win in this way, we do not want or need the business. Employees will not offer, give, or receive bribes, kickbacks or other illegal payments in any form under any circumstance.

The precise definition of what constitutes a "bribe" varies. However, a bribe is broadly defined as offering, promising or making a payment of anything of value intending improperly to cause or influence the decisions of an individual, a company or a government official to act in a specific way, or that creates an improper advantage. Bribes are intended to influence a person's decision; this may mean to cause a person to act, or in some cases, to fail to act.

Examples of a bribe may include:

- Contributions to charity at the direction of a person being bribed
- Corrupt payments that are disguised as legitimate expenses
- Provision of gifts, including University promotional items
- Giving a job to a family member
- Granting a scholarship to a family member of the person being bribed
- Inappropriate rebates or discounts
- Kickbacks (defined as a seller's return of part of the purchase price of an item to a buyer or buyer's representative for the purpose of inducing a purchase or improperly influencing future purchases)
- Meals, travel arrangements or other forms of entertainment that are outside the University's Gifts and Entertainment policy
- Quid pro quo arrangements
- Personal services
- Many countries, including the U.S., have anti-bribery and anti-corruption laws. The University complies with all such laws and related rules and restrictions.

Seeking Assistance

The Anti-Bribery and Anti-Corruption policy is located in the Policy Library. If an employee believes there has been a Foreign Corrupt Practices Act or other bribery violation, the matter must immediately be reported to the Ethics Helpline at **888.310.9569** or www.uopxhelpline.com.

COMPLIANCE

Records Management

All University accounts, financial reports, tax returns, expense reimbursements, time sheets and other documents, including those submitted to government agencies or other accreditors or regulators, must be accurate, clear and complete. All entries in University books and records, including departmental accounts and individual expense reports, must accurately reflect each transaction.

We maintain appropriate internal controls in order to ensure our financial reports, records and disclosures are complete, accurate and timely, and fairly reflect the transactions and activities of University of Phoenix. We maintain books and records in reasonable detail and in accordance with appropriate accounting policies, procedures, standards and regulations.

The University's information and records are valuable corporate assets and must be managed with due care. Additionally, we must comply with legal and regulatory requirements related to document and record retention and disposal. As a result, we have established a Records Management policy that addresses properly caring for, storing, retrieving and disposing of University records. This includes a records retention schedule that identifies the categories of records that are maintained, the length of time records are to be retained, and related records management procedures and guidelines. Employees, outside consultants, contractors, vendors and agents who do business with or on behalf of the University should manage their University-related records consistently with our Records Management program.

In the event the University becomes aware of, or reasonably anticipates, expected litigation or a government investigation, actions must be taken to preserve all relevant documents and information and suspend any related destruction processes.

Find More Information

For more information regarding our Records Management policies and practices, refer to the Confidentiality and Intellectual Property section of this Code or the Records Management page on the UOPX Ethics and Compliance internal website.

Ethical Dilemma

Q: Our department is in the process of moving to another location. We have a lot of old accounting documents and related correspondence that we'd rather not have to move. We lack the storage space in our new location, so we're wondering if we can save some time and effort and place them in the shred bin prior to our move.

A: All University documents must be retained for specified periods of time and as required by any applicable legal hold orders; so before you choose to destroy your old records, you must refer to the **Record Retention Schedule** or contact the UOPX Ethics and Compliance Records Management Office and ensure the records are not subject to a legal hold. Additional information is located on the **UOPX Ethics and Compliance internal website**.

COMPLIANCE

Privacy

We are entrusted with confidential information, including personal information from our employees, students, faculty, vendors and others. We have a responsibility to protect and use this information with respect and care. We protect confidential information we collect by designating individuals who are responsible for the Privacy and Information Security program in the University. We have implemented appropriate safeguards to protect confidential information from misuse, compromise or loss. These are our core privacy principles:

- We employ the levels of protection necessary for the security and quality of confidential information. Confidential information is only transferred in consistency with our privacy policies.
- Confidential information that we collect is retained no longer than the minimum time necessary to fulfill legitimate business purposes or comply with statutory or regulatory requirements.
- Confidential information is only used for legitimate business purposes as permitted and/or required by our agreements, statutes or regulations.
- Our privacy policies are disclosed as required by law or regulation.

Find More Information

Each of us is responsible for understanding the University's Corporate Privacy, Employee Privacy, and Information Security policies and complying with them. For additional information regarding these policies, refer to the [Policy Library](#) located on the UOPX Ethics and Compliance internal website.

COMPLIANCE

Confidentiality and Intellectual Property

We are expected to preserve and protect confidential information using the highest standards of care. Confidential information includes information relating to employees, students and faculty, or University proprietary information. Examples of such confidential information include:

- Student information, particularly non-directory Information
- Personal information about our past or present employees or faculty
- Financial information about the University
- Business and marketing plans
- Academic strategy and agreements
- Proprietary technical information and other similar information about the University

In addition to this information being confidential, it is the property of the University and may be protected by patent, trademark, copyright privacy and trade secret laws. Additionally, we respect the patents, trademarks, copyrights and confidential information of others.

Confidential information of the University must be used for University purposes only, and only by employees whose job duties require them to access that information. Employees are expected to maintain the confidentiality of information entrusted to them by the University and our students, and to prevent disclosure of this information unless the disclosure is authorized by management or is legally mandated.

An employee's obligation to preserve and protect confidential information continues even after their employment with the University ends.

Ethical Dilemma

Q: I've developed a tool that could help students improve their math skills. I'd like to market and sell my product to companies such as UOPX and other educational institutions. I've used my own personal time and resources in the development of my tool, and although I'm a full-time employee of UOPX, I think I ought to have exclusive rights to market and sell it.

A: Even though you've used your personal time and resources to develop the math tool, there are other considerations that must be examined before concluding that UOPX has no proprietary rights regarding the tool. This requires review of the tool, your planned uses of it and the circumstances under which it was developed. You should also review the UOPX Conflicts of Interest policy to make sure all ethical obligations to UOPX are addressed. UOPX Ethics and Compliance should be contacted to begin these discussions.

Find More Information

For additional information related to proprietary and confidential information, refer to the Intellectual Property policy located in the [Policy Library](#).

Respect

Our Working Environment

University of Phoenix is an institution dedicated to the pursuit of excellence and facilitation of an environment that fosters this goal. Central to that institutional commitment is the principle of treating each community member fairly and respectfully. To encourage such behavior, the University prohibits discrimination, harassment and retaliation, and provides equal opportunities for all community members, including students, faculty, staff and visitors, and applicants, regardless of their race, color, religious creed, national origin, ancestry, physical or mental disability, medical condition, marital status, sex, age, sexual orientation, gender identity or expression, veteran status or any other characteristic protected by law. Where actions are found to have occurred that violate this standard, the University will take prompt action to stop the offending conduct, prevent its recurrence and discipline those responsible.

Diversity and Inclusion

We work in a diverse, global and ever-changing workplace and industry. We embrace this aspect of who we are and value our differences as a source of innovation and competitiveness. We encourage our teams to understand the dynamics of their students, customers and industry. To demonstrate our commitment to each other and our values, we expect our employees to treat everyone they encounter in the course of their work with dignity and respect.

Equal Opportunity; Prohibition of Discrimination, Harassment and Retaliation

We make employment decisions on the basis of merit and business needs, and we are an equal opportunity employer and comply with all applicable employment and labor laws and regulations. We are committed to a work environment that fosters trust, creativity and excellence. In furtherance of this goal, we promise and expect that all our team members will treat each other, our colleagues and our students with respect and dignity and encourage others to act similarly. We do not tolerate discrimination, harassment or retaliation of any kind.

Find More Information

For additional information on our policies prohibiting discrimination, harassment and retaliation, refer to the Employee Handbook or the [UOPX Ethics and Compliance internal website](#).

Ethical Dilemma

Q: My department began interviewing candidates for a new position. I was part of the interview committee with the hiring manager (also my direct manager). We had one outstanding candidate who was not chosen because the hiring manager felt “this candidate would not fit in well with the rest of our team” because she was too mature and could impact the youthful attitude of our team. Instead, the hiring manager chose a candidate whose age was closer to that of the rest of our department, even though she was less qualified and interviewed poorly. Should I do anything?

A: Yes, you absolutely should take action. [Discuss your concerns about the situation with a member of management or contact the Ethics Helpline or Human Resources so the issue can be addressed.](#)

RESPECT

Our Labor Practices

We believe in treating each other fairly and with respect, and we protect and support human rights in all communities in which we operate.

We expect all of our business partners and vendors to adhere to these same standards. We will never use child labor or forced labor, and we respect and comply with all relevant labor laws.

Each of us is responsible for creating a workplace that is safe, supportive of one another and our ethical culture, and free from abuse of any kind. University of Phoenix is an equal opportunity employer and complies with all applicable laws in jurisdictions where we operate.

Workplace Safety

We are committed to providing a safe and healthy workplace and make every effort to comply with all applicable compliance requirements related to occupational health and safety. Each of us shares the responsibility for ensuring workplace safety by taking reasonable precautions to prevent accidents and report unsafe conditions.

Employees should use common sense and sound judgment related to actions in the workplace and when conducting UOPX business. We expect employees will not engage in risky activities that may endanger themselves or others.

Ethical Dilemma

Q: What should I do if I think I have been retaliated against at work?

A: Report it! The University expects all of its employees to treat one another with dignity and respect. Speak with your manager about what is occurring, or speak to your manager's manager. You may also contact Ethics and Compliance, Human Resources or the Ethics Helpline for additional assistance.

Ethical Dilemma

Q: When I walk out to my car at night, I notice some of the security lights in the parking lot are out. I'm concerned about parking my car and then walking to it alone. What should I do?

A: The University is dedicated to providing a safe work environment for our staff, students, faculty and visitors. Any safety or security concerns should be reported immediately to a Campus Security Authority or front-desk security staff for immediate assistance. Also, keep your supervisor informed of your concerns (as he/she too may wish to follow up to ensure timely and complete resolution to your concerns).

RESPECT

Workplace Violence

We do not tolerate workplace violence. Any violent acts or threats, including, but not limited to, the following, will not be tolerated in any form:

- Intimidation
- Bullying
- Stalking
- Verbal or physical aggression
- Threats
- Harassment
- Retaliation
- Coercion

Seeking Assistance

Individuals should immediately call emergency 911 for police assistance if they believe the situation warrants it. The Global Security Operations Center (GSOC) should be contacted after disconnecting with 911. In cases where emergency 911 is not warranted, the GSOC should be contacted when an immediate threat to persons or property exists or if guidance is needed related to a safety concern. To report information, the GSOC is available 24 hours a day, seven days a week at **866.992.3301**.

For questions or concerns related to safety procedures or to report unsafe conditions, contact a supervisor, the Campus Security Authority, the GSOC or Office.ComplianceUOPX@phoenix.edu for assistance.

Thank You

The University Code of Ethics is intended to provide clarity regarding our values, principles and approach to ethical decision-making. Each of us must strive every day to sustain our ethical culture by living our values and upholding our principles. This means making the ethical choice even when it may not be the easiest, or the most popular. In this way, we will continue to be a University community comprised of ethical people empowered to make ethical decisions.

If you have any questions, please contact UOPX Ethics and Compliance at Office.ComplianceUOPX@phoenix.edu.

