



2022

CODE OF ETHICS

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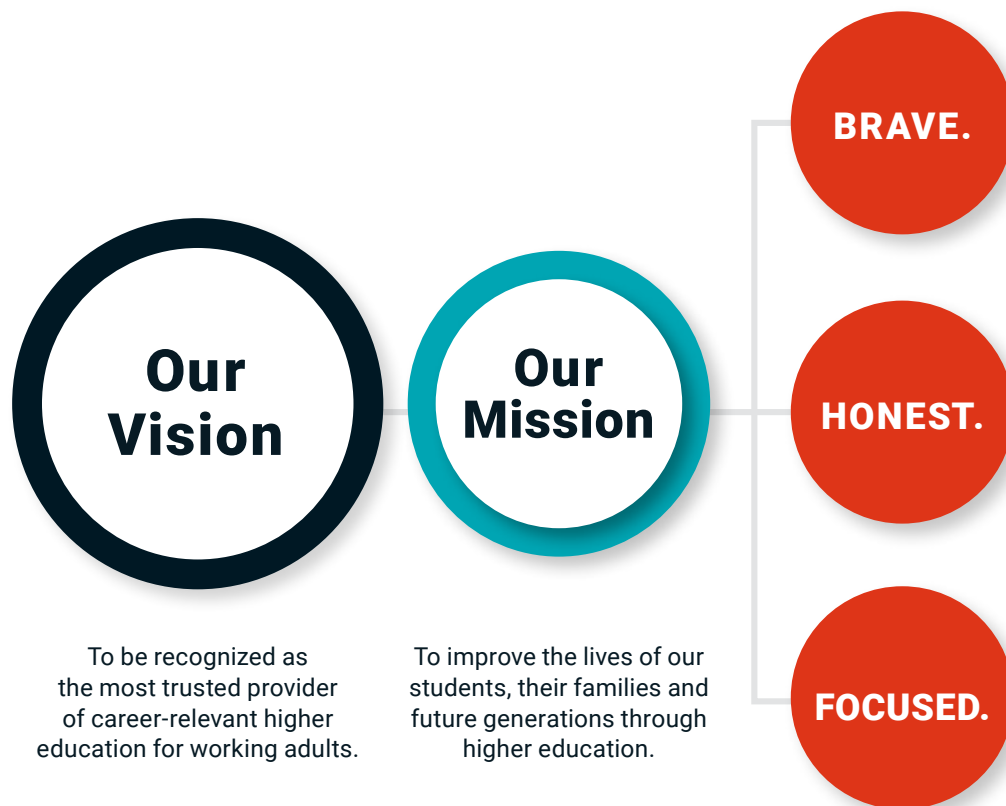
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Ethics at University of Phoenix

How it all fits

Our vision, mission and values work together to guide our actions and influence how we solve problems and inform how we make decisions. These attributes enable us to deliver on our mission in support of the students we serve.



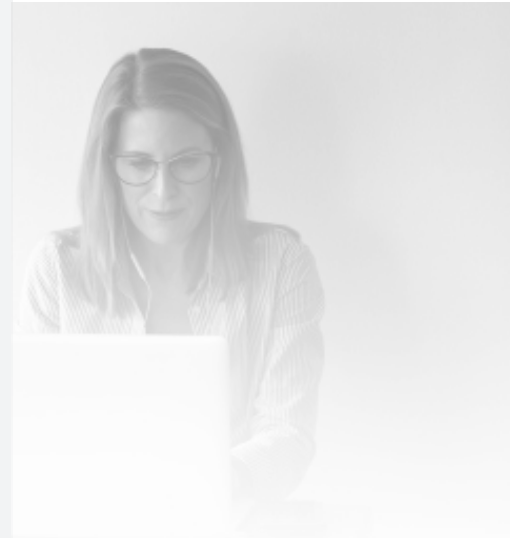
Core values

Core Values set the foundation for our company culture by guiding our behaviors and the decisions we make.

We are Brave, Honest, Focused.

Our ethical principles

- We conduct ourselves with honesty, integrity, and the highest ethical standards.
- We seek out and embrace diversity, equity, and inclusion and belonging – valuing differences in people, perspectives, and experiences.
- We contribute to the communities in which we work and live by being good corporate and individual citizens.
- We honor our commitments and promises.
- 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.
- We will not sacrifice our values or our goals for short-term gains; we are focused on building lasting success, stability, and excellence.
- We are committed to providing world-class service to our students, customers, partners, stakeholders, and each other.



Ethical decision-making

- Clearly identify the issue or concern.
- Know the facts.
- Consider those who may be impacted by the decision or action and how they'll be affected.
- Look at each available option and consider whether each one is balanced and fair.
- Consult with experts on the issue.
- Use good judgment, keeping in mind our core values, this Code, and our University policies.

University of Phoenix leadership

The University of Phoenix board of trustees is committed to principles of ethical leadership, board independence, oversight, and accountability. The board oversees University performance and acts in the best interests of the University and our stakeholders.

University leaders maintain positions of trust and, as such, model our core values and foster a culture of ethical conduct by:

- Establishing appropriate internal controls to ensure efficiency, accuracy, and timeliness of transactions and financial information
- Ensuring University employees are aware of their rights and responsibilities under University policies, applicable laws and regulations, and preventing fraud and abuse of University resources
- 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, Compliance, and Data Privacy department.

Our Code and how it applies

The University's board has adopted and approved this Code of Ethics. All employees of University of Phoenix acknowledge their responsibility to adhere to the Code and University policies. Additionally, any outside consultants, contractors, suppliers, and agents hired by the University are expected to abide by this Code when performing services on our behalf. The University also administers a Faculty Code of Conduct, a Student Code of Conduct, and various additional policies that apply to these audiences.

How to promote the Code

- Ensure any advice given to others (internally or externally) is correct, legal, timely, and complete.
- Model our core values, this Code of Ethics, and our Student and Faculty Codes of Conduct (as applicable).



Enforcing the Code

When the University receives information regarding an alleged violation of this Code, we take prompt action to evaluate it and determine whether an informal inquiry or a formal investigation is necessary. Violations of this Code may result in corrective action up to and including termination, as well as referral to law enforcement, as appropriate.

Asking questions and reporting concerns

We're here to help our University community understand their rights and responsibilities, offer guidance when ethical dilemmas arise, answer questions, and provide a variety of means to report and respond to concerns.

If anyone believes there has been a violation of our Code, University policy, or law or regulation, or witnesses what they believe to be illegal or unethical behavior, we want to know. Our employees and those who conduct business on the University's behalf have a responsibility to report concerns promptly and can report by any of the means listed here that feels the most comfortable. In fact, not reporting a violation is itself a violation of our Code. Nothing in this Code is intended to discourage reporting illegal activity — including violation of any regulation, rule or law (federal, state, or foreign) — to the appropriate regulatory or legal authority.

Anyone can submit a report to our Ethics Helpline conveniently and discreetly, online or over the phone. All reports received are reviewed by Ethics, Compliance, and Data Privacy promptly. We ask that reports be as specific as possible and include details such as: names, dates, times, places of the circumstances and individuals involved, as well as locations of evidence and contact information for any witnesses. Reports may also be made anonymously. After submitting a report, individuals are encouraged to call or check back online to review the status of the report, add any additional information, or ask questions.

Ask a question or report a concern to:

- A manager or another leader
- Human Resources
- The Ethics Helpline, available 24 hours a day, 7 days a week, at **888-310-9569** or **uopxhelpline.com**
- University Ethics, Compliance, and Data Privacy at **Office. ComplianceUOPX@phoenix.edu**



Concerns regarding auditing, internal controls, or accounting irregularities should also be reported to the Ethics Helpline or Ethics, Compliance, and Data Privacy directly to investigate such concerns, irrespective of their source or materiality, and, as appropriate, forward them to the University's board of trustees.

The University will maintain confidentiality and protect the identity of anyone who makes a complaint or reports a concern to the maximum extent possible. We will therefore not disclose the identity of the individual reporting the concern or allegation unless such disclosure is unavoidable or the University is required by law to disclose the information.

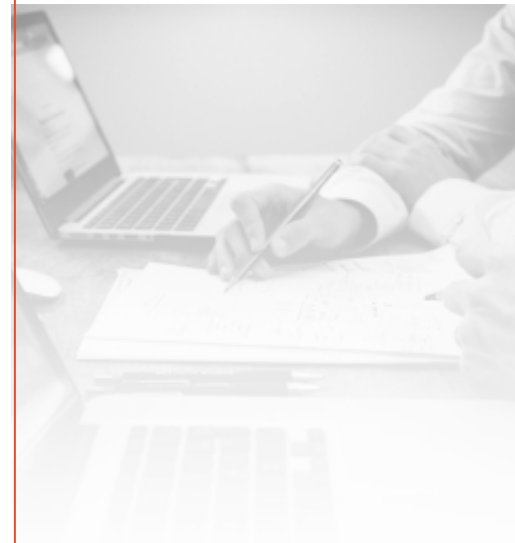
We expect those who report concerns to do so in good faith, meaning the information being reported is true to the best of the individual's knowledge and includes all relevant information. Anyone who reports a concern in good faith is protected for such reporting from retaliation that would adversely impact their relationship with the University. Reports of retaliation are also thoroughly and promptly reviewed. Any employee who knowingly submits a false report will be subject to corrective action.

Investigations and audits

Our 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.

In the event of a government investigation or audit, employees should contact University Legal Services regarding any additional procedures that may apply, including record preservation holds and similar protocols. Failure to cooperate in an audit or investigation may result in corrective action, up to and including termination.

Retaliation against anyone who participates in an investigation, inquiry or audit is prohibited and may result in corrective action up to and including termination. To report retaliation, refer to the "Asking questions or reporting concerns" section within this Code.



Personal responsibility

Conflicts of interest and corporate opportunities

Our employees owe their primary professional allegiance to the University. Outside professional activities, private financial interests, 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. We expect our employees with other professional or financial interests to disclose them in compliance with the University's Conflicts of Interest policy.

A conflict of interest may exist when:

- Personal interests conflict with the interests of the University.
- Personal interests interfere or could interfere with the performance of duties.
- An employee may not be effective or objective in their University duties due to personal interests.
- An employee uses University time, information, assets or their position or influence at the University for personal gain.
- An employee's outside employment or board service, or that 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.

Q&A

Q: I am a full-time employee at University of Phoenix and was recently asked to serve on the board of an educational technology company. 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, Compliance, and Data Privacy.

Conflict of interest disclosure

Conflicts, potential conflicts, and outside business opportunities must be disclosed to University Ethics, Compliance, and Data Privacy in advance or as soon as practicable for review and guidance. Ethics, Compliance, and Data Privacy will determine whether a potential conflict of interest exists, as well as outline any necessary expectations or appropriate resolutions. Additional information on conflicts of interest, outside employment, service on boards of directors, as well as the Conflict of Interest Disclosure Form, can be found on the University Ethics, Compliance, and Data Privacy intranet site.

Communicating with fellow employees, students, the public and others

Our employees are expected to demonstrate our core values, professionalism, and discretion in any interactions that relate to, reflect on, or may impact the University. This means we are fair, honest, considerate, and respectful in all of our professional activities and communications. We do not place self-interest above business needs, students' needs, or the viewpoints and contributions of others and do not communicate in ways that damage relationships.

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. Communication that does not meet these expectations may result in corrective action, up to and including termination.

Our Public and Media Relations and Social Media 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.

Additional resources

Refer to the Policy Library, located on the employee intranet, for more information related to our Public and Media Relations, Social Media, Acceptable Use Standards, or other University policies. If there are any questions related to appropriate actions or communications, contact University Ethics, Compliance, and Data Privacy at Office.ComplianceUOPX@phoenix.edu.

Individuals who receive a request for comment on the University's behalf from the media or a third party, and who are not authorized to speak on behalf of the University, should forward the request to the Public Relations team. Additionally, before publishing, making a speech, giving an interview, or presenting at a conference on behalf of the University, employees should contact Public Relations and University Ethics, Compliance, and Data Privacy for guidance.

Employees who participate in social media activities are expected to demonstrate our ethical principles and core values. They must follow all relevant University policies, guidelines, and standards, including Information Security, Privacy, Social Media, Public and Media Relations, and Intellectual Property.

Use of University resources

Our employees and anyone who conducts business on behalf of the University are expected to safeguard University information and use University resources wisely, considering efficiency, privacy, and cost. Good judgment and discretion should be exercised when using University systems, devices, internet access, or other funds or property, including 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 or its stakeholders.

Gifts and entertainment

Our 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 University's Gifts and Entertainment policy, are approved and appropriate, and do not create an expectation or inference of an obligation.

Q&A

Q: A student's personal computer crashed. They asked me to log into the student website and post a class assignment for them. Is this allowed?

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

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.

Our employees may not use University funds or assets to give gifts, favors, entertainment, or services to our suppliers, government officials, or government employees. Likewise, gifts may not be offered to or accepted from potential or active students without the advance approval of University Ethics, Compliance, and Data Privacy.

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, suppliers). Therefore, it is important to review the Gifts and Entertainment policy in the Policy Library prior to offering, giving, or accepting any gift, entertainment, or favor. Questions regarding gifts and entertainment should be directed to University Ethics, Compliance, and Data Privacy.

Educational loans and student loan providers

Our 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.

Our 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.

Q&A

Q: I manage a team of enrollment representatives. 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: 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 that when it comes to gifts, the right thing is to thank the student and politely decline.

More on Title IV

As we receive 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 University Ethics, Compliance, and Data Privacy intranet site and the Policy Library.

Honesty

Fair dealing

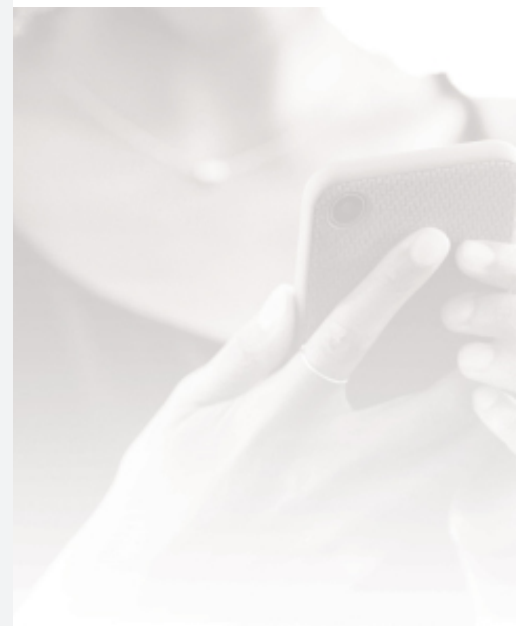
We are fair and honest in all our business dealings, including with respect to who we are, what we do, and what services we provide. We provide unparalleled support and quality service. We act with accountability, honor our promises, and ensure we fulfill our obligations to others.

We do not insult or disparage others, including our competitors and colleagues. We 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 or tolerate the following behaviors:

- Dishonest acts
- Deceptive acts
- Embezzlement
- Forgery or alterations of negotiable instruments or other documents
- Unauthorized handling or reporting of transactions.
- Falsification of records, including but not limited to student records and 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 **uopxhelpline.com**.



Fair competition

We compete to win in a fair and open manner. Therefore, we comply with all antitrust and competition laws that apply to us, as well as with similar laws that are intended to prevent unfair business practices or restrict competition. We only gather information about our competitors and competing products and services by legal and ethical means. We do not ask others to disclose trade secrets unless they are authorized to do so.

To promote fair competition, we do not do the following:

- Discuss or agree to fix prices with our competitors
- Divide up or allocate territories, markets, contracts, or customers with our competitors
- Set unfair prices or attempt to monopolize or discriminate in our sales to certain customers
- Share confidential information with our competitors about pricing, costs, profits, customers, or other sensitive information that relates to our competitive practices or other University business
- Condition the sale of products or services on the purchase of other products or services from University of Phoenix
- Attempt to monopolize a market. When we have formal or informal discussions with competitors and suppliers in settings such as conferences and meetings, we do so in an informed manner and after appropriate coordination with University Ethics, Compliance, and Data Privacy.
- Establish wage-fixing agreements and no-poaching agreements, such as:
 - Agreeing with individual(s) at another company about employee salary and other terms of compensation, either at a specific level or within a range
 - Agreeing with individual(s) at another company to refuse to solicit or hire that other company's employees

Public disclosures

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 relevant to their area of expertise and the disclosures being made
- 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 a variety of causes, including those focused on providing access to education, serving historically under served 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.

Our employees may choose to contribute and participate as volunteers in the University's charitable works and projects or may participate through personal giving. 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

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 we seek to prevent pollution, minimize waste, lower our carbon footprint, reduce greenhouse gas emissions, and conserve energy and natural resources whenever we can. We also strive to promote environmental stewardship through our philanthropy and sustainability-related degree programs.

Learn more about corporate citizenship

The Policy Library, located on our employee intranet, contains our policy on Giving and Volunteerism.



We publicly provide our environmental actions, including our environmental objectives and performance, this Code, and an annual inventory of our domestic greenhouse gas emissions.

We engage in sustainable business practices, including:

- Purchasing environmentally preferable supplies and services from environmentally responsible suppliers and contractors
- Monitoring efficiency of our operations
- Conserving water and energy
- Recycling, reusing, and using recycled materials or materials from sustainable sources
- Involving our employees in sustainability efforts and surveys
- Promoting virtual or remote work for our employees, where possible

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. Our 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, our 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 vendors, contractors, and other suppliers to share our values and principles of ethical behavior.

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

Procure more information

Refer to the Policy Library, located on the employee intranet, to learn more about procurement or government contract compliance. Additionally, the Strategic Sourcing and Procurement department maintains specific procedures governing the procurement process that apply to employees engaged in these processes.



We strive to always be truthful and avoid false claims or statements to our vendors contractors and suppliers. 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.

Our 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.

Anti-bribery and anti-corruption

We believe in competing for and winning business legally and ethically. Employees will not offer, give, or receive bribes, kickbacks, or other illegal payments in any form under any circumstance.

While the precise definition of what constitutes a “bribe” varies, it may be 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 causing a person to not act when they otherwise would.

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 cash or cash equivalents (e.g. gift cards)

Seeking assistance

The University’s 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 **uopxhelpline.com**.

COMPLIANCE

- 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.

Records management

The University's information and records are valuable assets and must be managed with due care as set forth by legal and regulatory requirements as well as the expectation of our students. Our records, whether digital or physical, are maintained in accordance with policies, procedures, standards, and regulations. We leverage appropriate internal controls to ensure University records, including those submitted to government agencies or other accreditors or regulators, such as financial reports and disclosures, are complete, accurate, timely, and fairly reflect the transactions and activities of University of Phoenix and our students.

Q&A

Q: While working from home, can I print work documents that I use on a daily basis?

A: It is important to avoid printing documents whenever possible, not only to reduce waste but also to protect University proprietary or personal information. If you are required to print from home, you must also ensure that printed documents are maintained or destroyed in accordance with our Records and Data Management policy. Additional information is located on the University Ethics, Compliance, and Data Privacy intranet site.

Our Records and Data Management program specifically addresses the lifecycle of University records and provides a records retention schedule that identifies the length of time those records are to be retained and procedures for their disposal. Our employees, contractors, suppliers, and agents who do business with or on behalf of the University must manage University-related records according to our Records and Data Management policies.

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 data and information and suspend any related destruction processes.

Confidentiality and privacy

We are entrusted with confidential information, including financial, and personal information of prospective, current, and past employees, students, vendors, contractors, and suppliers as further described in the applicable University Privacy policies. We disclose our Privacy policies and protect and use the information we receive with respect and care, in accordance with those policies and other applicable laws and regulations.

Everyone is responsible to protect confidential information at the University, and we have designated Privacy and Information Security teams to help ensure appropriate, commercially reasonable safeguards are in place to protect that information from misuse, compromise, or loss.

Suggested further reading

For more information regarding our Records and Data Management policy and practices refer to the “Confidentiality and privacy” below and the “Intellectual property” section of this Code or the Records and Data Management page on the University Ethics, Compliance, and Data Privacy intranet site. To learn more about the University’s Privacy, Employee Privacy, and Information Security policies, refer to the University’s Privacy policy and the Policy Library located on the employee intranet.

Intellectual property

We also have proprietary and confidential intellectual property that must be protected. Examples include, but are not limited to:

- Financial information about the University
- Business and marketing plans
- University branding
- Academic strategy and agreements
- Technical information and innovation concerning University systems, software, and infrastructure
- Work by employees created in the scope of the University's employment

Our intellectual property is protected by patent, trademark, copyright, and trade secret laws. University intellectual property must be used for University purposes only, and only by employees whose job duties require them to access that information. Our employees are expected to maintain the confidentiality of the University's intellectual property, which is entrusted to them by the University, and this obligation continues even after their employment with the University ends. Our employees are also expected to maintain the confidentiality of the intellectual property of others that the University does business with, e.g., affiliates, business-to-business clients, vendors, contractors, suppliers, and other potential business partners.

FYI on IP

The Intellectual Property policy, located in the Policy Library, contains more information related to proprietary and confidential information.

Q&A

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 University of Phoenix 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 the University, 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 the University 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 review the University's Intellectual Property policy as well as the Conflicts of Interest policy to make sure all obligations to the University are addressed.

Our working environment

We are dedicated to the pursuit of excellence and are committed to treating each member of the University fairly and respectfully. We provide equal opportunities to everyone regardless of race, color, religion, creed, sex, pregnancy, sexual orientation, gender, gender identity or expression, familial or marital status, age, physical or mental disability, medical condition, genetic information, national origin, ancestry, ethnicity, citizenship, military or veteran status, or any other status or characteristic protected by applicable federal, state, or local law.

Equal opportunity; prohibition of discrimination, harassment, and retaliation

We make employment decisions based on merit, business needs, and University policy. 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. 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. In the event of a violation, the University will take prompt action to stop the offending conduct, prevent its recurrence, and implement corrective action, up to and including termination.

Help create a safer workplace

For additional information on our policies prohibiting discrimination, harassment, and retaliation, refer to the Policy Library.

Q&A

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. What should I do?

A: You should 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.

Diversity, equity, inclusion and belonging

We work in a diverse and ever-changing workplace and industry. We embrace and value our differences as they facilitate innovation and competitiveness. We encourage our teams to understand and value the uniqueness of their fellow employees, students, and other University stakeholders. 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.

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 our business partners, vendors, and suppliers 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 our employees is responsible for creating a workplace that is safe, supportive of each other 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.

Q&A

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

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



Workplace safety

We are committed to providing a safe and healthy workplace and make every effort to adhere to all applicable compliance requirements related to occupational health and safety. Each of our employees shares responsibility for ensuring workplace safety by taking reasonable precautions to prevent accidents and report unsafe conditions in addition to adhering to all Centers for Disease Control and Prevention and Occupational Safety and Health Administration guidelines and local ordinances. Our employees who work from home on a full or part-time basis are expected to maintain a home workspace in a safe manner, free from safety hazards.

Our employees are expected to use common sense and sound judgment related to actions in the workplace and when conducting University business, on- or off-site. We expect our employees will not engage in risky activities that may endanger themselves or others.

Workplace violence

Violence and threats of violence are not tolerated at the University in any format, under any circumstances. Acts of violence or threats of violence include, but are not limited to, the following and could occur either physically or virtually:

- Intimidation
- Bullying
- University branding
- Stalking
- Verbal or physical aggression
- Threats to persons or property
- Harassment, sexual or otherwise
- Assault, sexual or otherwise
- Retaliation
- Stalking
- Coercion
- Dating or domestic violence

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 walking to and from my vehicle alone at night. What should I do?

A: The University is committed to providing a safe work environment for our employees, students, and visitors. Any safety or security concerns should be reported immediately to a campus safety coordinator or front-desk security for immediate assistance.

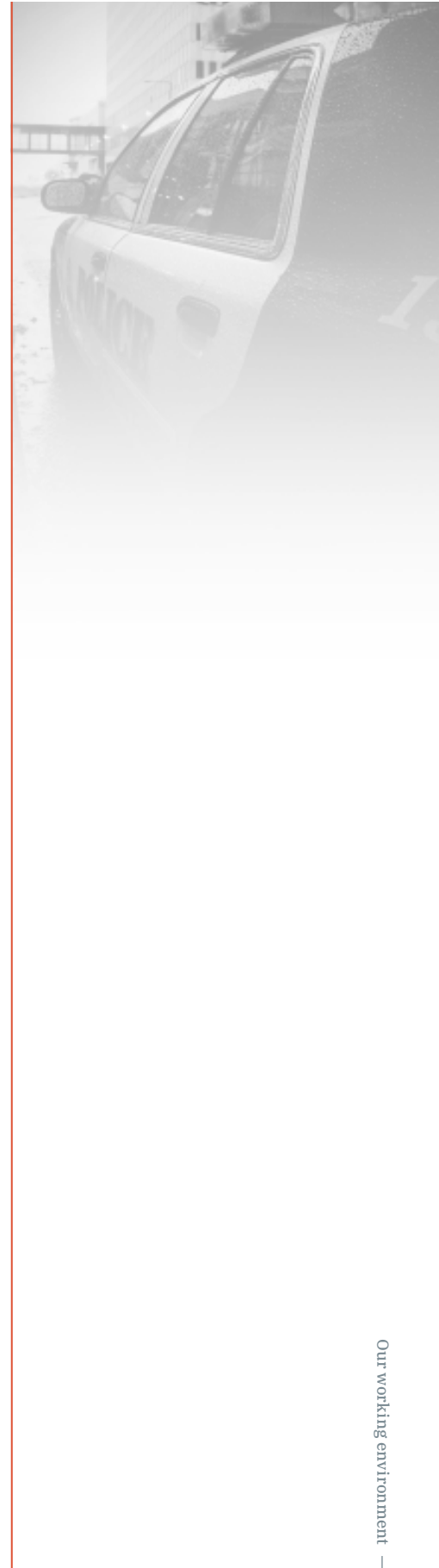


Seeking assistance

Individuals should immediately call emergency 911 for police assistance if they believe the situation warrants it. Our Security Operations Center (SOC) should be contacted after disconnecting with 911. In cases where emergency 911 is not warranted, the SOC should be contacted when an immediate threat to persons or property exists or if guidance is needed related to a safety concern.

The SOC is available 24 hours a day, 7 days a week at **866-992-3301** or **SOC@phoenix.edu**.

For questions or concerns related to safety procedures or to report unsafe conditions, contact a manager, the campus safety coordinator, the SOC or **Office.ComplianceUOPX@phoenix.edu** for assistance.



Thank you

We sustain our ethical culture by living our values and upholding our principles every day. This means making the ethical choice even when it may not be the easiest or the most popular. In doing so, we will continue to be a University community comprised of ethical people empowered to make ethical decisions.

Please contact University Ethics, Compliance, and Data Privacy at **Office.ComplianceUOPX@phoenix.edu** with questions.

