

Ethics at University of Phoenix

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Our vision, mission, and values work together

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problems, and inform how we make decisions.

These enable us in our commitment to serve and support our students.



Our ethical principles

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

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- 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 ne3 (v)6.1 (ee T* 5 (o)14.O a)-67 (s) (t1c15.8 (on)2.8 (t)-9.1 (i)14.9 (o-12.5 (s t)-6.6

Enforcing the Code

When the University receives information regarding an alleged violation of this Code, we take prompt action to evaluate the allegation and determine whether an informal inquiry or a

Personal responsibility

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corporate opportunities

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or perceived divergence between the University mission

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As with all other areas of our business, we want all dealings to be reasonable, legal, and transparent. Gifts and entertainment may be acceptable if unsolicited, infrequent, modest, intended for legitimate purposes, and reported when necessary. Likewise, gifts or entertainment that could be misused or misconstrued as

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are unacceptable.

Some activities and gifts require review and approval in advance. Find more information about these requirements, review the Activity and Gift Requests site located on the employee intranet, or contact ECDP with any questions.

Education lenders

Our employees and their family members may not give or receive any gifts, gratuities, entertainment, or other favors of any value to or from any current or prospective education loan lender in connection with the University or its business.

Our employees who are involved in contractor selection, purchasing, or related approval processes concerning education loan lenders 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

We receive federal student aid funding pursuant to Title IV of the United States Higher Education Act, as amended. All University employees who

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 act with accountability, honor our promises, and

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We do not insult or disparage others, including our competitors



Fair competition

We compete to win in a fair and open manner. Therefore, we comply with all applicable antitrust and competition laws, 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:

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- 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
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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 accordance with applicable University policies.
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agreements, such as:
 - Agreeing with individual(s) at another company about employee salary and other terms of compensation,

Public disclosures

We are committed to fair, accurate, complete, and timely disclosures to the public, 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

Charitable contributions

We believe in giving back to the communities where we live, work, and serve. Through our University Mission, foundation, and commitment of time, money, and resources 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



We engage in sustainable business practices, including:

- Purchasing environmentally preferable supplies and services from environmentally responsible environmentally responsible sources
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- Conserving water and energy
- Recycling, reusing, and utilizing recycled materials or materials from sustainable sources
- Involving our employees in sustainability efforts and surveys
- Promoting virtual 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, and associated laws and regulations administered by the U.S. Department of Education. The University is directly and

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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. As needed, our employees will be informed of actions that ma(s)5 (l)14.4 (o)(e)-1.7 (d o)16.3722.nA>-i-9.1 6.372k.1 (e)-.9 (n)-1 (r Tw T*-)]TJ T* [(D)-7.4 (.7 (s actinv2 (ea)17.5 (c)3rglaeleh455-7.4 (n) (r)-5s-7.4 (.c (e)1.l b)-3.8 (i)-6.1 (n)16.9 (d5s)3 12

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COMPLIANCE

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





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 (including traits historically associated with race, such as hair texture and protective hairstyles), color, religion, creed, sex, pregnancy (including lactation, childbirth, and related medical conditions), sexual orientation, gender, gender identity or expression, family status, marital status, age, national origin, ancestry, disability status, and protected characteristics.



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

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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. All employees are responsible for ensuring workplace safety by taking reasonable precautions to prevent accidents and report unsafe conditions, including in home workspaces. In addition, employees are expected to adhere to all Centers for Disease Control and Prevention and Occupational Safety and Health Administration guidelines and state and local ordinances.

All employees are responsible for exercising common sense and sound judgment in the workplace and when conducting University business. We expect our employees will not engage in risky activities that may endanger themselves or others.

Workplace violence

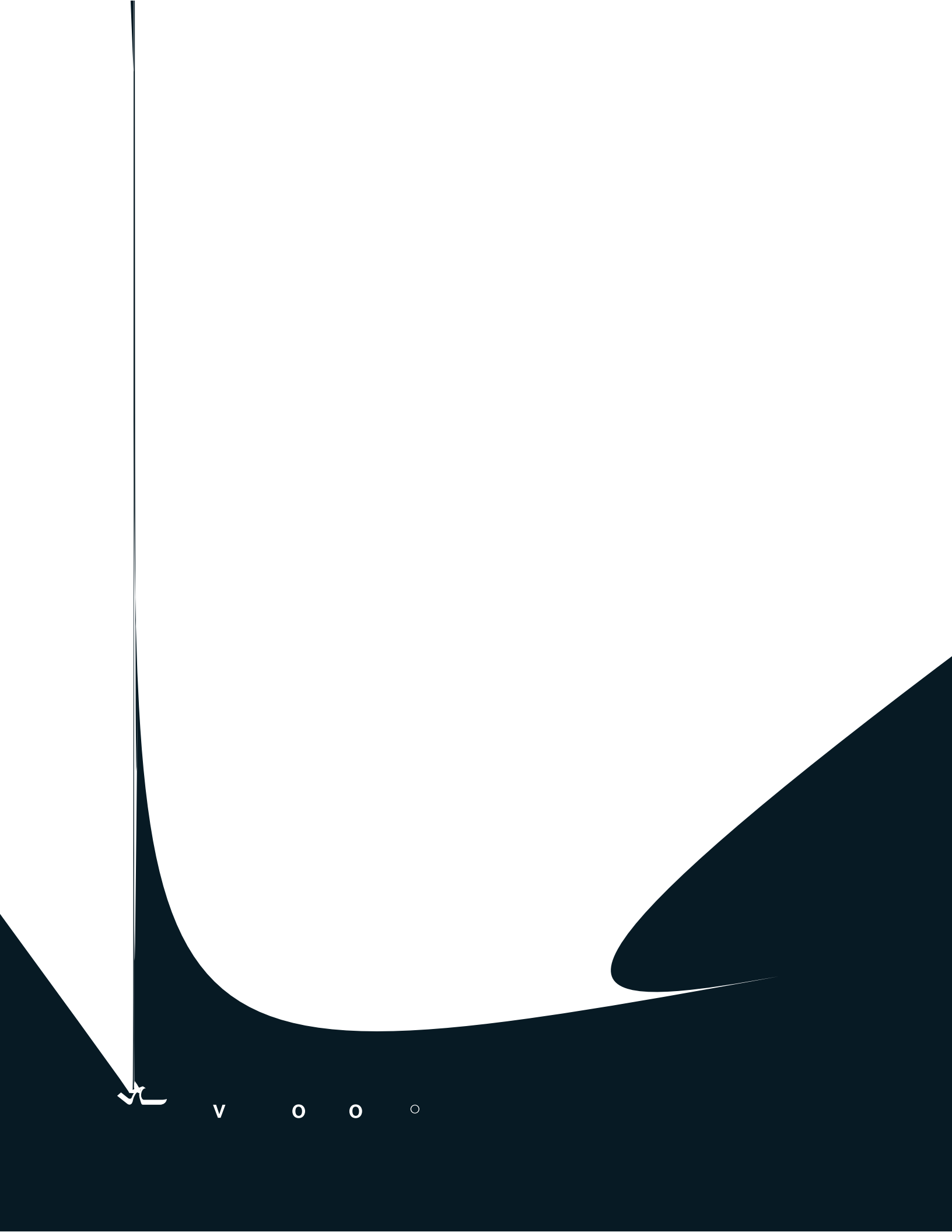
Violence and threats of violence are not tolerated at the

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, whether at work on campus or in the virtual workplace.

The SOC is available 24 hours a day, 7 days a week at [866-992-3301](tel:866-992-3301) or SOC@phoenix.edu .

For questions or concerns related to safety procedures or to report unsafe workplace conditions, contact a manager, the campus safety coordinator, the SOC (S)-16 Lb73301d



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