

American University of the Caribbean School of Medicine



American University of the Caribbean School of Medicine

2025-2026 Annual Disclosure
Student Right-to-Know and Campus Security (Clery Act)
Annual Security Report
Annual Fire Safety Report
Sex and Gender Based Misconduct Response and Prevention Policy
Alcohol & Substance Abuse Policy
Student Rights under FERPA
(The Family Educational Rights and Privacy Act)

This document includes information for:

Cupecoy, St. Maarten

September 15, 2025

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

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CAMPUS WATCH

It's your campus - Protect it!

A truly safe campus can only be achieved through the cooperation of students, faculty and staff. As a member of the American University of the Caribbean School of Medicine (AUC) community, it is your responsibility to report a crime, suspicious activity or other emergencies on campus to the appropriate school official. Should you become a witness to or victim of a crime, immediately report the incident to local law enforcement officials, the Office of Student Affairs, or to the Manager of Safety & Security. All crimes will be investigated and when appropriate, brought to the attention of the Student Services office for disciplinary hearings.

Purpose of the Annual Disclosure Report

AUC prepares this report to comply with the *Jeanne Clery Disclosure of Campus Security and Crime Statistics Act*. The full text of this document can also be found on the <http://www.aucmed.edu/about/student-consumer-information.aspx> or by visiting your local Safety & Security office. This report was prepared with the assistance of local law enforcement agencies. Campus crime, arrest and referral statistics include those that were reported to local law enforcement and campus faculty and staff. This data may also include crimes that have occurred in private residences or businesses adjacent to the campus.

REPORTING CRIMES AND EMERGENCIES

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

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

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

Once each semester, AUC will contact the St. Maarten police departments and property management to monitor and record crimes that occur within the designated area surrounding the campus that have been reported to the local Police.

Police Emergencies – Dial 9-1-1

Medical Emergencies – Dial 9-1-2

Fire Emergencies – Dial 9-1-9

ANNUAL SECURITY REPORT

AUC will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the SIREN notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

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

AUC will:

- Test emergency response and evacuation procedures on an annual basis
- Document each test, including the date, time, and whether it was announced or unannounced
- Publicize emergency response and evacuation procedures in conjunction with at least one test per calendar year

SIREN EMERGENCY ALERT SYSTEM

In the event of an emergency or a potentially dangerous threat to the campus or center arises, students, faculty and staff will receive timely notification via the SIREN system, on campus flyers, and/or email announcements. This includes any Clery Act crimes that are reported to the campus IC or local police and are considered to represent a serious or continuing threat to students, faculty, and staff. Please make sure to keep contact information updated in SIREN through the student portal at <https://community.aucmed.edu> for students and the Adtalem Global Education Commons at <https://atge.okta.com/app/UserHome> for faculty and staff.

Area Police/Fire Non-Emergency Numbers:

<u>County/City</u>	<u>Police</u>	<u>Fire</u>	<u>Paramedic</u>
St. Maarten	721-542-2222	721-543-1316	721-542-2111

CAMPUS ACCESS, FACILITY SECURITY AND LAW ENFORCEMENT

St. Maarten Campus

The Facilities department maintains the building and grounds with a concern for safety and security. Facilities staff inspect the facility regularly, promptly make repairs affecting safety and security hazards, and respond to reports of potential safety and security hazards such as broken windows, locks, etc. Students, faculty and staff can assist the Facilities staff by calling 4041-347 to report concerns. Additionally, the Facilities Manager routinely inspects the grounds and building to review lighting and other environmental concerns for safety.

There are fire alarms and pull stations throughout the facility that should be used only in the event of an emergency. If an emergency requires evacuation, there are signs clearly posted throughout the building indicating the best routes for evacuation.

Both buildings are generally open 24/7 with exception of the week prior to and the week of examinations. In the event the building is closed, it is locked and monitored by campus security. Access to classrooms and laboratories is limited to those enrolled in the courses meeting there. Access to on- and off-campus activities is limited to actively enrolled students and their guests. Students are responsible for the behavior of their guests at all times at campus-arranged events. AUC reserves the right to require that AUC identification cards be presented for admittance to certain locations and events. AUC may also require students to register their guests with Student Services prior to attendance. Student, faculty and staff identification cards should be worn at all times. Due to state specific COVID-19 guidelines, please reach out to the campus directly for updated times in which the building is open.

Campus security is available 24 hours per day and may serve as an escort between buildings and vehicles. They respond to safety and security concerns and can be contacted by calling Ext. 4041-257 or directly at+1721-545 0619. The security officer has the authority to ask questions and request identification at any time. Criminal incidents will be referred to local law enforcement.

All crime victims and witnesses are strongly encouraged to report incidents to both campus security and local police. Prompt reporting will ensure timely warning notices to the campus community and timely disclosure of crime statistics.

Students living in off-campus student housing facilities should check with the apartment landlord for specific safety and security measures at their complex. Although most complexes provide keys for individuals and restrict access to apartments, the level of additional security varies from complex to complex. Crimes committed at off-campus housing should be immediately reported to the Police department with jurisdiction over the complex and as soon as reasonably possible to the Student Services office.

The campus security department maintains a policy concerning the monitoring and recording, through local police departments, of criminal activity in which students engaged at off-campus locations of student organizations officially recognized by the institution, including student organizations with off-campus housing facilities.

MISSING STUDENT POLICY

To report a student missing, please contact Office of Student Affairs. An official missing student report will be referred immediately to the campus security department, or in the absence of a campus security department, to the local law enforcement agency that has jurisdiction in the area.

Students living in an on-campus housing facility may identify a contact person(s) who will be notified if the student is determined missing by the campus security department or the local law enforcement agency. Contact information will be confidential, accessible only to authorized campus officials and law enforcement, and may not be disclosed outside of a missing person investigation. The Missing Student Designated Contact form is available at the Office of Student Affairs.

If a student is under the age of 18 and not emancipated, AUC must notify a custodial parent or guardian when the student is missing, in addition to any contact person designated by the student. The local law enforcement agency will be notified when a student is reported missing, unless the local law enforcement agency was the entity that made the determination that a student is missing.

MISSING STUDENT PROCEDURES

When a student residing in an on-campus student housing facility is determined to have been missing for 24 hours, AUC will:

- Notify student's designated contact person within 24 hours;
- If the student is under 18 years of age and is not emancipated, notify the student's custodial parent or guardian and any other designated contact person within 24 hours; and
- Inform the local law enforcement agency that the student is missing within 24 hours.

SAFETY AND SECURITY

Campus safety and security is the shared responsibility of students, faculty and staff. To enhance student, faculty and staff awareness of their responsibility for personal safety, various information and services, including but not limited to, the following are provided throughout the year:

- Pamphlets on personal safety
- Emergency safety information
- Optional renters insurance information for housing students
- Safety/security displays in the library and/or student services office
- Use of institution publications as a forum for personal safety topics
- Institution housing inspections to consider security precautions
- Escort services provided by on-duty security officer

Safety and Security Tips

Personal

- Stay alert and tuned in to your surroundings.
- Communicate that you are calm, confident and know where you are going.
- Stay away from isolated areas.
- Stay on the part of sidewalks furthest away from shrubs, dark doorways and alleys.
- Walk with a companion whenever possible.
- Check the back seat before getting into a car. Keep doors locked while driving.
- Don't overload yourself with packages or wear shoes or clothing that restricts movement.
- Avoid displaying large amounts of cash or jewelry.
- Carry a purse close to your body. Carry a wallet in an inside coat or front trouser pocket.
- If you think someone is following you, abruptly switch directions and walk toward an open store, restaurant or lighted home.
- Don't hitchhike or pick up hitchhikers.
- Park in well-lighted areas.

- Avoid isolated bus stops at times when few other people are around.
- Do not reveal your name, phone number or address to strangers.
- Never admit that you are alone or that you will be away from home.
- Keep an eye on neighbors' homes or apartments while they are away and have them do the same for you.
- Keep your local police department's phone number next to your phone.

Residence

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

Vehicle

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

Office

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

CAMPUS CRIME STATISTICS ARE INCLUDED AT THE END OF THIS DOCUMENT.

FIRE SAFETY

AUC on-campus student housing

The AUC on-campus student housing facility utilizes the "Keltron" fire safety system. This integrated system, monitored by campus security, has smoke and heat detectors in every room. In the event of fire, campus security is notified instantly and the fire department is dispatched.

Fire drills are conducted at a minimum once per year at on-campus student housing and all equipment is tested every 4 months.

Students residing in on-campus student housing are required to comply with the following policies:

Smoking/Vaping- Smoking/Vaping is prohibited within the on-campus student housing facilities, including elevators, stairwells, balconies, patios, etc. Occupants may smoke only in designated areas outside the building, away from entrances and windows.

Fire Hazards - The following items are considered fire hazards and are not allowed in the on-campus student housing, including the balconies, hallways, or common areas: camp stoves, hibachis, hot plates, and gas or charcoal grills. Occupants must not leave candles or incense unattended or use them near curtains, bedding or other loose fabrics

Fire Alarms and Drills - Fire drills are held periodically to ensure residents are familiar with the alarm and the emergency building evacuation plan. All persons must leave the building anytime an alarm sounds. The building evacuation plan for each building is posted on every floor. Every alarm must be treated as an emergency.

Fire Hazard Inspection – The Island’s Fire Marshal conducts inspections of all rooms for fire hazards once a year and will return to conduct spot inspections.

Fire Safety Equipment – Occupants shall not inappropriately activate any emergency warning equipment or falsely report any emergency remove, damage, interfere or tamper with fire safety or other emergency warning equipment, including smoke detectors and heat detectors.

Evacuation Procedures – In the event of a fire, all students are required to exit the building to a designated safety zone. The Resident Assistants live at all times assist campus security to evacuate the building. The Residence Assistants will remain with all the students in the safety zone. The fire department will arrive and inspect the building and insure all residents have evacuated. No one is allowed back into the building until the fire department gives clearance.

Fire Alarm Monitoring – The on-campus apartment building fire system is monitored onsite by the office of Safety & Security.

For purposes of including a fire in the annual fire safety report, students and employees must report that a fire occurred to one of the following AUC colleagues:

1. Gerard Lake, Incident Commander
2. Denis Thomas, Sr. Facilities Manager
3. Quincy Turner Safety & Security Manager
4. Melissa Harrison-Grinuva, Asst. Manager, Department of Housing & Residential Life

The annual fire safety report instance documentation and log of fire safety policy updates are maintained by the manager of Safety & Security.

The fire safety system used for on-campus housing facility includes:

- Fire extinguishers are accessible from each room.
- All rooms are equipped with smoke and heat detectors.
- Three fire hydrants are located in close proximity to the dormitory buildings with supporting hose rails.
- No Smoking signs are posted in each student dormitory/room and are reviewed every semester for incoming students.
- Campus Safety and Security monitors non-smoking of students, faculty, guests and stakeholders on an ongoing basis on University Housing grounds.

Students and colleagues must report fire occurrences to:

- On duty security officers at ext 4041-257
- Incident Commander – Gerard Lake at ext 4041-285
- University Housing – Mrs. Melissa Harrison-Grinuva at 4041-250
- St. Maarten’s Fire Department – 9-1-9

CAMPUS FIRE SAFETY REPORTING AND STATISTICS ARE INCLUDED AT THE END OF THIS DOCUMENT.

SEX-BASED MISCONDUCT RESPONSE & PREVENTION POLICY

POLICY STATEMENT

American University of the Caribbean School of Medicine (“AUC”) is committed to providing a work and educational environment free of unlawful harassment, discrimination and retaliation. AUC expressly prohibits sex-based misconduct, which includes sexual harassment, sex discrimination, sexual assault, rape, domestic violence, dating violence, stalking, sexual exploitation and sex-based harassment. Any acts that meet this Policy’s definitions of sex-based misconduct are a violation of AUC’s Policy. AUC is committed to fostering an environment where any alleged violation of this Policy is promptly reported, and complaints are resolved in a fair and timely manner. Creating a safe environment is the responsibility of all members of the community. Regardless of the definitions provided below, anyone who believes they are a victim of sex-based misconduct should report the incident as soon as possible to the Sexual Misconduct Response Coordinator (See “Definitions” section below for contact information) or the campus complaint administrator in addition to seeking immediate medical and/or safety assistance.

This Policy applies to complaints or reports of alleged sex-based misconduct. AUC states that no student or employee should be denied equal access to educational programs or activities on the basis of sex, regardless of geographic location. Accordingly, AUC has adopted this institutional Policy to ensure that students and employees are protected even when they are located outside of the United States.

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

SCOPE

This Policy applies to all members of the AUC community, and includes but is not exclusive to faculty, staff, students, visitors, volunteers, vendors and persons related to, receiving or seeking to receive services, or otherwise pursuing studies with the organization. It also applies, as appropriate, to any alleged act of sex-based misconduct that adversely impacts the AUC community, whether those acts occur on or off campus.

KEY DEFINITIONS

“**Affirmative Consent**” is the affirmative, knowing, conscious, voluntary and mutual agreement to engage in sexual activity. Consent can only exist free from intimidation, force, threat of force or coercion. Under this Policy, “No” always means “No” and “Yes” may not always mean “Yes.” Anything but voluntary, conscious, affirmative consent to any sexual activity is equivalent to “no” for purposes of this Policy. It is the responsibility of each person involved in the sexual activity to ensure that he or she has the affirmative consent of the other or others to engage in the sexual activity. Affirmative consent must be ongoing throughout a sexual activity and can be revoked at

any time. While the legal definition of consent is found in the AUC's Annual Disclosure, the following general rules apply when assessing whether consent has been/was given.

- Consent can never be assumed.
- The lack of protest or resistance does not constitute consent, nor does silence.
- Where there is use of threat, force or restraint by the Respondent, the lack of verbal or physical resistance or the submission by the victim does not constitute consent.
- The manner of dress of the victim does not constitute consent.
- The existence of a dating relationship between the persons involved or the fact of past sexual relations between them should never, by itself, be assumed to be an indicator of consent.
- Consent to sexual activity with one person does not constitute consent to sexual activity with another person.
- A person who initially consents to sexual contact, including penetration, may withdraw continued consent at any time during the course of that interaction. When consent is withdrawn or can no longer be given, engagement in sexual activity must stop.
- Consent to some form of sexual activity cannot automatically be taken as consent to any other form of sexual activity.
- A person cannot consent to sexual activity if that person is unable to understand the nature of the activity or give knowing consent due to circumstances, including without limitation the following: the person is incapacitated due to use or influence of alcohol or drugs; the person is asleep or unconscious; the person is under age, or the person is incapacitated due to a mental disability.
- Consent is required regardless of whether the person initiating sexual activity is under the influence of drugs and/or alcohol.
- A power differential between people engaged in a sexual act presumes the inability to consent for the less powerful person (e.g., the student in a student-colleague interaction; the supervisee in a direct report-supervisor interaction).
- It is not a valid excuse to alleged lack of affirmative consent that the Respondent believed the victim consented to sexual activity if the:
 - Respondent's belief arose from the Respondent's own intoxication or recklessness
 - Respondent did not take reasonable steps to ascertain whether the Complainant affirmatively consented
 - Respondent knew or a reasonable person should have known that the Complainant was unable to consent because the Complainant was asleep, unconscious, incapacitated due to the influence of drugs, alcohol or medication, or was unable to communicate due to a mental or physical condition.

“Colleague” an employee of American University of the Caribbean School of Medicine.

“Colleague Code of Conduct” refers to the “Adtalem Code of Conduct and Ethics” (<https://www.adtalem.com/sites/g/files/krcnkv321/files/migrations/media/Code%20of%20Conduct%20English%20and%20Portuguese.pdf>), which is applicable to colleagues at all Adtalem Global Education institutions and offices and outlines colleagues' rights and responsibilities.

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

“Complainant” an individual who is alleged to be the victim of conduct that could constitute sex-based misconduct.

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

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

“Decision-Maker” panel of no fewer than three (3) member who will facilitate the live hearing and determine if a violation of this Policy occurred.

“Domestic Violence” includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction.

“Formal Complaint” is a document (hardcopy or electronic) filed by a Complainant or signed by the Sexual Misconduct Response Coordinator alleging Sexual Harassment against a Respondent and requesting that AUC investigate. A Formal Complaint must be signed (physical or digital) by the Complainant, the Sexual Misconduct Response Coordinator, or otherwise indicate that the Complainant is the person filing the Formal Complaint. At the time of filing a Formal Complaint, the Complainant must be participating in or attempting to participate in AUC’s education Program or Activity with which the Formal Complaint is filed.

“Mandatory Reporter” is an employee who must report all instances of Sexual Harassment to the Sexual Misconduct Response Coordinator. All employees are Mandatory Reporters.

“Member of the AUC community” includes students, faculty members or staff and any other individuals associated with American University of the Caribbean School of Medicine. The conduct administrator or complaint administrator shall determine a person’s status in a particular situation.

“Notice” refers to any information regardless of whether it is direct, indirect, partial or complete received by a colleague that indicates possible sex-based misconduct. When notice is received, colleagues are required to inform the Sexual Misconduct Response Coordinator or their supervisor who, in turn, must make a report to the Sexual Misconduct Response Coordinator.

“One-up manager” is a colleague’s manager’s manager. It is the person responsible for receiving a colleague’s complaint when his/her direct manager is implicated in that complaint.

“Program or Activity” is an on or off campus locations, events, or circumstances over which AUC exercises substantial control over both the Respondent and the context in which the Sexual Harassment occurred.

“Rape” is any penetration, no matter how slight, of the vagina or anus with any body part or object or oral penetration by a sex organ of another person, without the affirmative consent of the victim and/or by force. Rape may involve strangers or a non-stranger (e.g., friend, classmate, relative, spouse or co-worker). In these instances, rape is often referred to as “acquaintance rape.” Rape is a crime regardless of a relationship or lack thereof between individuals.

“Respondent” an individual who has been reported to be the perpetrator of conduct that could constitute sex-based misconduct.

“Sexual Assault”¹ means an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation.

“Sexual Contact” means the deliberate touching of a person’s intimate body parts (including lips, genitalia, groin, breast, buttocks or clothing covering any of those areas), or using force to cause self-touching by another person of intimate body parts.

“Sexual Exploitation” occurs when a person takes non-consensual or abusive sexual advantage of another for the advantage or benefit of themselves or any other person that is not the person being exploited by the behaviors. Examples include but are not limited to: invasion of sexual privacy; prostitution; non-consensual recording of nudity or sexual activity; voyeurism; knowingly exposing someone to an STI, STD or HIV; intentional exposure of genitals in non-consensual circumstances and sex-based stalking or bullying.

“Sexual Harassment” is a colleague (employee) as a condition of his or her employment or as a result of an individual’s participation in unwelcome sexual conduct (i.e. quid pro quo);

¹ The FBI’s Uniform Crime Reporting Program (FBI UCR) includes forcible and nonforcible sex offenses such as rape, fondling, and statutory rape, which contain elements of “without the consent of the victim.”

2. Unwelcome conduct that a reasonable person would determine is so severe, pervasive, and objectively offensive that it effectively denies a person equal access to AUC's education program or activity; or
3. Sexual Assault, Dating Violence, Domestic Violence or Stalking.

“Sex-based Misconduct” is a broad term used to refer to all conduct prohibited by this Policy. This encompasses sexual harassment, sex-based harassment, dating violence, domestic violence, rape, sexual assault, sexual exploitation and stalking that fall outside of RUSVM's Title IX policy. Sex-based misconduct includes unwelcome conduct, including harassment, of an unacceptable nature based on actual or perceived biological sex, including behaviors based on sex stereotypes. Sex-based misconduct can occur between strangers or non-strangers, including people involved in an intimate or sexual relationship. Sex-based misconduct can be committed by any person regardless of sex or sexual orientation of the victim or perpetrator.

“Sexual Misconduct Response Coordinator” is Dr. Angela Walden-Weaver Assistant Dean of Student Affairs (titleixcoordinator@aucmed.edu or **721.545.2298**) responsible for overseeing compliance with all aspects of this Policy and designated to receive and monitor resolution for all sexual misconduct reports.

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

“Code of Conduct applicable to students” refers to the policy titles “Student Code of Conduct,” which is accessible in the student handbook. It outlines students' rights and responsibilities, as well as the process by which action may be taken against a student for Code violations.

“Student complaint procedure” is the vehicle by which students can bring to AUC's attention any complaint relating to their experience with AUC or a member of the AUC community. It is the mechanism for investigating and attempting to resolve complaints raised by students. The student complaint procedure can be found in the student handbook <https://www.aucmed.edu/academics/student-handbook-course-catalog>.

“Speak Up” refers to the Speak Up Program, a reporting system managed by a third-party vendor (Convercent), which encourages members of the AUC community to come forward with questions or concerns, including allegations of sex-based misconduct. Reports can be made anonymously, or reporters can provide their name and contact information. Colleagues are expected to ask legal, compliance and ethics questions and report suspected wrongdoing. Colleagues and students can utilize the Speak Up program by contacting the third-party contractor Convercent by phone at **1.800.461.9330 (in the U.S.) or +1.720.514.4400 (in St. Maarten)**, or online at www.speakupadtalem.com.

“Stranger” and **“Non-stranger”** are terms to describe the association between a victim of sexual harassment or sexual misconduct and the Respondent. A “Stranger” is a person(s) not known by the victim at the time of the alleged sexual harassment or sexual misconduct. A “Non-stranger” is a person(s) known by the victim, whether the person(s) is known casually, intimately or for a short or long period at the time of the alleged sexual harassment or sexual misconduct. AUC's

Sex-Based Misconduct Response and Prevention Policy applies to misconduct involving both Strangers and Non-strangers, occurring on- or off-campus.

“**Supportive Measures**” are individualized services reasonably available upon report of sex-based misconduct.

“**Title IX**” is a federal law which prohibits Sexual Harassment committed against persons in the United States as part of AUC’s education program or activity. AUC’s Title IX policy is <https://www.aucmed.edu/student-consumer-information>. Title IX is enforced by the U.S. Department of Education.

“**Title IX Coordinator**” is Dr. Angela Walden-Weaver Assistant Dean of Student Affairs (titleixcoordinator@aucmed.edu or **721.545.2298**) is responsible for overseeing compliance with all aspects of AUC’s Title IX policy and responsibilities.

HOW TO FILE A COMPLAINT

If you have experienced or witnessed sex-based misconduct, AUC encourages you to notify the Sexual Misconduct Response Coordinator as soon as possible after the incident. A report may be made to either or both the police and the Sexual Misconduct Response Coordinator. The criminal process is separate from AUC’s process. Complainants have the option to notify law enforcement directly or be assisted in doing so. If requested, AUC will assist a victim of Sexual Harassment in contacting the police. A Complainant is not required to contact the police in order to pursue AUC’s grievance process.

A report can be filed with a manager, one-up manager, incident commander, designated local campus administrator or through the Sexual Misconduct Response Coordinator.

Sexual Misconduct Response Coordinator: Dr. Angela Walden-Weaver
Assistant Dean, Student Affairs
American University of the Caribbean
1 University Drive at Jordan Road
Cupecoy, St. Maarten
721.545.2298 | TitleIXCoordinator@aucmed.edu

Reports can be made by victims, third parties or bystanders with the option to remain anonymous through the Speak Up program by phone at **1.800.461.9330 (in the U.S.) or +1.720.514.4400 (in St. Maarten)**, or online at www.speakupadtalem.com. Timely response to electronic reports should occur within 12 hours of initial receipt.

If a victim wishes to access local community agencies for support or law enforcement to make a report, upon request, AUC will assist the victim in making these contacts. Direct assistance, though limited, remains available when reports are made anonymously through Speak Up.

Anyone may make a report regarding any information pertaining to violations of this Policy. All AUC colleagues (faculty, staff, administrators and student workers) who are not otherwise identified in this Policy or through institutional addendums as confidential resources are required

to immediately provide any information received about any actual or suspected sex-based misconduct impacting the AUC community to appropriate officials with some very narrow exceptions discussed elsewhere in this Policy (see “Confidentiality”). Regardless of how notice is received, reports may prompt a need for AUC to investigate.

REPORTING BY COLLEAGUES TO EXTERNAL AUTHORITIES

Colleagues who are made aware of a possible violation of this Policy are required to contact their manager or one-up manager and also the Sexual Misconduct Response Coordinator. Colleagues can also submit named or anonymous reports of sexual and/or sex-based misconduct by utilizing the Adtalem “Speak Up” hotline at www.speakupadtalem.com.

Colleagues should contact the Sexual Misconduct Response Coordinator with any questions about whether a report to law enforcement is appropriate. Nothing in this Policy prohibits a student or colleague from reporting a crime directly to local authorities.

Disciplinary procedures are independent of any and all procedures and proceedings under local, state or federal criminal or civil law. In all cases, AUC reserves the right to refer cases for parallel criminal prosecution or to pursue sanctions regardless of criminal prosecution. Violations of this Policy by a visitor, volunteer, vendor, agents or other third parties affiliated with AUC may also result in the termination of pre-existing or future relationships.

COMPLAINANT’S RIGHTS

AUC will implement Supportive Measures to protect victims of sex-based misconduct and maintain a positive learning and working environment by minimizing or eliminating contact between Complainant and Respondent and providing reasonable academic, employment, and administrative accommodations. See “Supportive Measures” paragraph above for additional details.

Complainant’s rights include:

1. The right to notify or not notify law enforcement and to request and receive assistance from AUC in making a report if desired.
2. The right to summary information on all available response options, such as complaint resolution procedures, including the necessary steps and potential consequences of each option whether or not a formal report is made to the institution.
3. The right to be free from undue coercion from AUC to pursue or not pursue any course of action.
4. The right to be informed of the institution’s role regarding orders of protection, no contact orders, restraining orders or similar lawful orders issued by a civil, criminal or tribal court (when applicable). AUC abides by orders of protection (including no-contact orders and restraining orders), which are generally issued by a municipal court to protect a person or entity in a situation involving sexual assault. AUC may also liaise

with local authorities to assist an individual who wishes to obtain protective or restraining orders.

5. The right to request and receive information on how to make a confidential report for the purposes of tracking campus crime without otherwise divulging details that would require or permit AUC to investigate and respond (when the incident has not yet been reported to a colleague required to notify the Sexual Misconduct Response Coordinator).
6. The right to contact information for the Sexual Misconduct Response Coordinator, available confidential advisors, community-based resources (sexual assault crisis centers or other appropriate support services), campus security and/or local law enforcement.
7. The right to be fully informed of any applicable disciplinary conduct process and procedures.
8. The same rights as the Respondent to attend and have a support person of their choice and/or witnesses present at student conduct hearings and any meetings leading up to such a hearing.
9. The right to be informed of the outcome of any student or colleague conduct process involving alleged sex-based misconduct regardless of participation in the process leading to that outcome. In the case of student conduct proceedings, victims have the right to appeal the outcome.
10. The right to request Supportive Measures.
11. The right to obtain and have enforced a campus-issued limiting instruction or no contact order or a court issued order of protection or no contact order.
12. The right to be informed about AUC's ability to provide assistance, upon request, in accessing and navigating campus and/or community resources for health, mental health, advocacy, and/or other services for survivors of sexual assault, relationship violence and other forms of sexual misconduct.
13. The right to be free from any suggestion that they are at fault or should have acted in a different manner to avoid reported sex-based misconduct.
14. The right to not be required to describe the incident to more representatives than absolutely necessary for proper investigation and response and under no circumstances will a victim be required to repeat details of the incident to secure appropriate accommodations.
15. The right to make an impact statement during the point in any conduct review process where the decision maker is prepared to deliberate on appropriate sanctions.

CONFIDENTIALITY

AUC wishes to create an environment in which individuals feel free to discuss concerns and make complaints. AUC understands that victims, witnesses and others involved in the investigation process may be concerned about the confidentiality of the information they are sharing. In some cases, however, AUC may be obligated to take action when it becomes aware of information relating to a complaint.

Confidentiality in cases of sex-based misconduct will be maintained to the extent permissible by law and consistent with AUC's obligations in investigating complaints. Once an individual discloses identifying information to AUC through the processes described above and in the applicable complaint procedures, that person will be considered to have filed a complaint with AUC.

While the confidentiality of information received, the privacy of individuals involved and compliance with the wishes of the Complainant or witnesses cannot be guaranteed, they will be respected to the extent possible and appropriate.

If students or colleagues wish to speak with someone who can assure confidentiality, they may contact a Confidential Advisor.

Confidential Resource: **AUC Wellness Counseling Center**
 American University of the Caribbean School of Medicine
 1 University Drive at Jordan Road Cupecoy, St. Maarten
 sxmwellness@aucmed.edu | 721.545.2298

Students are also encouraged to access counseling services available through AUC's Wellness Counseling Center at **721.545.2298** or sxmwellness@aucmed.edu. Colleagues may contact AskHR at **1.855.882.4770** for information on available resources.

These confidential resources permit discussion of an incident without beginning the investigation process. Local or profession specific mandatory reporting laws related to certain types of concerns (i.e., child sexual abuse) may still trigger a requirement for a confidential resource to report an incident to identified enforcement agencies.

SUPPORT AND RESOURCES

Upon report of alleged sex-based misconduct, the Sexual Misconduct Response Coordinator will offer individualized appropriate support ("Supportive Measures") or refer the victim directly to immediate assistance. Supportive Measures are available to the Respondent or Complainant, as appropriate. Examples include academic accommodations, changes in housing for the victim or a Respondent student, changes in working situations and other arrangements as may be appropriate and available (such as limiting orders, campus escorts, transportation assistance or targeted interventions).

Victims of sexual assault, dating violence, domestic violence and/or stalking will also be provided with written notification about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid and other services available.

AUC will keep confidential the victim's identity and any accommodations or Supportive Measures provided, to the extent that maintaining such confidentiality will not impair AUC's ability to provide the accommodations or Supportive Measures.

Supportive Measures are individualized and appropriate based on the information gathered by the Sexual Misconduct Response Coordinator. If circumstances related to an incident change over time, these and other Supportive Measures may be revisited. AUC may also provide referrals to counseling services, at the victim's option, including but not limited to the confidential colleague and student support services outlined above (See "Reporting"). Local resource lists can also be found through student services. A brief list of national and international referral sites can be found at the end of this Policy.

ADDITIONAL RESOURCES FOR COMPLAINANTS

Local Resources can be found in the AUC's Annual Security Report distributed to each campus community and posted on the Student Consumer Information page of AUC's website. The reports are available by location in a drop-down menu and contain lists of local resources available to victims of sex-based misconduct. The resource lists are updated annually.

To access this information, go to: <https://www.aucmed.edu/student-consumer-information>

Additionally, the following resources exist to provide information and links to external assistance:

- **National Sexual Assault Hotline** 1.800.656.HOPE (4673) rainn.org
- **National Domestic Violence Hotline** 1.800.799.7233 (TTY) 1.800.787.3224 thehotline.org
- **National Network to End Domestic Violence** nnev.org womenslaw.org
[Legal information and resources]
- **National Center for Victims of Crime** victimsofcrime.org
- **loveisrespect** 1.866.331.9474 (TTY) 1.866.331.8453 loveisrespect.org
- **National Suicide Prevention Hotline** 1.800.273.TALK (8255) suicidepreventionlifeline.org
- **Americans Overseas Domestic Violence Crisis Center** 1.866.USWOMEN (International Toll-Free) crisis@866uswomen.org
- **U.S. Embassy** usembassy.gov
- **Child Welfare Information Gateway** childwelfare.gov
- **State Statutes Including Mandatory Reporting Laws** childwelfare.gov/topics/systemwide/laws-policies/state

AMNESTY FOR COMPLAINANTS AND WITNESSES

AUC will investigate allegations of sex-based misconduct, including when drugs or alcohol may have been involved. AUC encourages the reporting of sex-based misconduct by victims and witnesses who are sometimes hesitant to report to AUC officials or participate in the resolution processes because of concern that they may be accused of policy violations, such as underage drinking or drug use at the time of the incident. It is in the best interest of the community that victims and witnesses come forward to share what they know regarding

violations of this Policy. To encourage reporting, AUC grants victims and witnesses amnesty, when appropriate, for potential AUC policy violations and provides all parties and witnesses other interim measures as appropriate or needed.

Similarly, AUC encourages direct assistance to those in need as a result of sex-based misconduct. In instances where minor policy violations are revealed as a result of a person providing assistance to a victim, policy violations should not be overlooked; however, AUC may provide educational options, rather than punitive sanctions, to those who offer their assistance.

COMPLAINT DISMISSAL

AUC may dismiss a Formal Complaint if the Complainant informs the Sexual Misconduct Response Coordinator, in writing, that he, she, or they withdraw the Formal Complaint or allegations therein; the Respondent is no longer enrolled or employed by AUC; or if specific circumstances prevent AUC from gathering sufficient evidence to reach a determination. If a Formal Complaint is dismissed, the parties will be provided written notice of the dismissal outlining the reason(s) for dismissal.

EMERGENCY REMOVAL

AUC can remove a Respondent entirely or partially from an educational Program or Activities on an emergency basis when an individualized safety and risk analysis has determined that an immediate threat to the physical or safety of any student or other individual justifies removal. The risk analysis is performed by the Sexual Misconduct Response Coordinator in conjunction with the Director, Enterprise Safety and Security.

In cases in which an emergency removal is imposed, the Respondent will be given notice of the action and the option to request to meet with the Sexual Misconduct Response Coordinator prior to such action/removal being imposed, or as soon thereafter as reasonably possible, to show cause why the action/removal should not be implemented or should be modified. This meeting is not a hearing on the merits of the allegation(s), but rather is an administrative process intended to determine solely whether the emergency removal is appropriate. When this meeting is not requested in a timely manner, objections to the emergency removal will be deemed waived.

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

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

GRIEVANCE PROCESS

AUC utilizes a prompt, equitable and impartial grievance process to evaluate reports. Personnel involved in the grievance process will be free from conflicts of interest or bias for or against the parties.

The parties will receive equal opportunity to provide information, witness statements, evidence, and other information that may be necessary to fully evaluate the alleged offense. Both parties will be afforded equitable rights and access during the grievance process.

Generally, the grievance process consists of a report, investigation, live hearing (including cross-examination), determination, disciplinary measures, remedies and appeal (if applicable). The grievance process, barring extenuating circumstance, will conclude within 90 calendar days from the date a report is received. The parties will be notified by the investigator or decision-maker if the process will take longer than 90 days.

ADVISOR

The parties may be accompanied by an advisor of their choice. If a party does not have an advisor present at the live hearing, the AUC will select and provide an advisor, without fee or charge, to conduct cross-examination of witnesses on behalf of that party. The parties may not conduct cross-examination.

Choosing an advisor who is a witness in the grievance process creates potential for bias and conflict of interest. A party who chooses an advisor who is also a witness can anticipate that issues of potential bias will be explored by the Decision-Maker.

The parties are expected to ask and respond to questions on their own behalf throughout the investigation phase of the grievance process. Advisors are expected to advise without disrupting proceedings. For example, advisors should not address AUC officials in a meeting or interview unless invited to. An advisor may not make a presentation during any meeting or proceeding and may not speak on behalf of the party to the investigation or other Decision-Maker except during a live hearing, during cross-examination. If an advisor is disruptive or otherwise fails to respect the limits of the advisor role, the meeting or interview may be ended.

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

INVESTIGATION

When the Complainant chooses or AUC believes it is necessary, a prompt, fair and impartial process from the initial investigation to the final result to resolve reports of sex-based misconduct. In the event a Complainant requests that an investigation not occur, their request will be honored when possible and unless AUC determines in good faith that failure to investigate creates a potential risk of harm to the Complainant or other member of the AUC community.

If an investigation is initiated, the process will be conducted by officials of the Office of Nondiscrimination and Access, or its designee, who will receive annual training on the issues related to sex-based misconduct, including sexual assault, dating violence, domestic violence and stalking and on how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability. AUC officials who do not have a conflict of interest or bias for or against the Complainant or the Respondent will conduct the process.

Generally, an investigation will consist of interviewing the Complainant, the Respondent and any witnesses. The parties will be provided an equal opportunity to present fact and expert witnesses or other evidence. The parties (and their advisors) will be provided with evidence directly related to the allegations, in electronic format or hardcopy, with at least 10 days for the parties to inspect, review, and respond to the evidence. The Investigator will consider the responses received from the parties before issuing the investigative report.

Once the investigation has concluded, the Investigator will draft an investigative report (hardcopy or electronic) that fairly summarizes relevant evidence. The investigative report will be sent to the parties (and their advisors) at least 10 days prior to a live hearing. The parties may provide a written response to the investigative report.

The colleague complaint procedure, which details the investigation and resolution processes and prohibited colleague conduct, can be found on the Commons (apps.adtalem.com > **Commons- HR Portal > Policy Central**).

Privacy of the records specific to a sex-based misconduct investigations are maintained in accordance with applicable law, including the Family Educational Rights and Privacy Act (FERPA). Any public release of information to issue a timely warning will not include the names of victims or information that could easily lead to a victim's identification. In appropriate instances, pertinent Supportive Measures and the results of disciplinary hearings regarding the Respondent will be disclosed to the Complainant. Confidentiality will be maintained whenever possible; however, AUC reserves the right to exercise discretion and disclose details of an incident or allegation to assure community safety or the safety of an individual.

INFORMAL RESOLUTION

If the Sexual Misconduct Response Coordinator deems appropriate and both parties voluntarily consent in writing, Formal Complaints can be resolved through informal resolution, such as mediation. The Sexual Misconduct Response Coordinator will facilitate an appropriate informal resolution process depending on the nature of the allegations, the parties involved, and the overall circumstances. Informal resolution will be conducted by a facilitator, who will be designated by the Sexual Misconduct Response Coordinator. At any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the grievance process. Informal resolution is unavailable to resolve allegations that a Colleague sexually harassed or sexual assaulted a student.

LIVE HEARING

If a report is not resolved informally, AUC will conduct a live hearing. Live hearings are facilitated by a designated Decision-Maker. The Decision Maker will be selected by the Office of

Access. The Decision-Maker consists of a panel of no fewer than three (3) members, designated from the hearing panel.

Cross-examination during the live hearing will be conducted directly, orally, and in real time by the party's advisor and not by a party personally. The Decision-Maker will permit each party's advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including that challenge credibility. Only relevant cross-examination questions (as well as other questions deemed pertinent at the discretion of the Decision-Maker) may be asked of a party or witness. Before a Complainant, Respondent, or witness answers a cross-examination question, the Decision-Maker must first determine whether the question is relevant and explain to the party's advisor asking cross-examination questions any decision to exclude a question as not relevant.

Rape shield protections are applied to Complainants, deeming irrelevant questions and evidence about a Complainant's prior sexual behavior unless offered to prove that someone other than the Respondent committed the alleged Sexual Harassment or offered to prove consent.

As of August 24, 2021, and pursuant to the Department of Education's August 24, 2021 guidance, the Decision-Maker may consider statements from a party or witness who are not present at the live hearing in reaching a determination regarding responsibility, so long as the questions are otherwise permissible. However, the Decision-Maker will not draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the live hearing or refusal to answer questions.

At the request of either party, AUC will provide for the entire live hearing (including cross-examination) to occur with the parties located in separate rooms with technology enabling the parties to see and hear each other. Live hearings may be conducted with all parties physically present in the same geographic location or, at AUC's discretion, any or all parties, witnesses, and other participants may appear at the live hearing virtually. An audio or audiovisual recording, or transcript, of any live hearing will be created and maintained for seven (7) years.

Individuals participating in the live hearing cannot be disruptive and must follow the policies and procedures set by AUC. The Decision-Maker has the authority to enforce decorum.

STANDARD OF EVIDENCE

The Decision-Maker will utilize the preponderance of evidence standard to determine if a violation of the Sex-Based Misconduct Response and Prevention Policy occurred. The preponderance of evidence standard means that based on all the information available, it is more likely than not that the alleged sexual harassment or sexual misconduct occurred.

EVIDENCE LIMITATIONS

AUC will not use, rely on or seek disclosure of information protected under a legally recognized privilege, unless the person holding such privilege has waived the privilege. AUC will not access or use a party's medical, psychological, and similar treatment records unless the party provides voluntary, written consent. Prior sexual behavior unless offered to prove that someone other than the Respondent committed the alleged sexual misconduct or offered to prove consent. Past findings

of domestic violence, dating violence, stalking or sexual assault may be admissible in the review process stage that determines sanction.

WRITTEN DETERMINATION

Once complete, the parties will be simultaneously informed in writing of the outcome. Notice to both parties will include the written statement detailing the factual findings supporting the determination and the rationale for the sanction/discipline (if any) to the degree possible and always when the sanction/discipline is directly relevant to that individual. The notice will also include appeal procedures, if applicable, and when the results become final.

DISCIPLINARY REVIEW AND ACTION

Acts of sex-based misconduct are subject to disciplinary action. Disciplinary actions against the Respondent will not be imposed before completion of AUC's grievance process. Following a determination of responsibility, appropriate corrective action will be taken, and AUC will take steps to prevent recurrence. Disciplinary actions taken will be determined on a case-by-case basis. Disciplinary action is not intended to determine criminal responsibility. Rather, it is intended to identify and respond to violations of AUC policy and community standards. Separate and distinct disciplinary action may also be considered in instances of retaliation against those who in good faith report or disclose an alleged violation of the comprehensive policy, file complaint, or otherwise participate in the complaint resolution procedure. Failure to abide by imposed disciplinary actions (whether by refusal, neglect or any other reason), may result in additional disciplinary action, including suspension or termination. Failure by Respondent to adhere to Disciplinary Action will be considered a form of retaliation or an extension of the initial allegations.

Individuals who make a materially false statement in bad faith in the course of a grievance process under this Policy will be subject to AUC's Code of Conduct policies.

REMEDIES

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

SANCTIONS FOR STUDENT MISCONDUCT

If AUC determines that sex-based misconduct has occurred, appropriate disciplinary sanctions for substantiated violations of this Policy by students, up to and including expulsion, will be imposed in accordance with the Code of Conduct applicable to students found at <https://www.aucmed.edu/academics/student-handbook-course-catalog>. The full list of available sanctions is provided in the Code of Conduct applicable to students.

This Policy statement is not intended to replace or substitute for the Code of Conduct applicable to students. This Policy is a supplement to the community standards that the Code of Conduct

applicable to students sets forth. In addition, violations of this Policy may trigger application of sanctions to a student imposed under local, state or federal law.

SANCTIONS FOR COLLEAGUE MISCONDUCT

Disciplinary sanctions for a colleague's violation of this Policy may include written reprimand, warning, probation, suspension, housing suspension, housing expulsion, limiting order, change in job assignment, office relocation, reduction of awards under the management incentive plan, or termination of employment or contract, and will be imposed in accordance with applicable AUC policies and procedures.

AUC reserves the right to impose further and/or different sanctions appropriate to an individual situation. In addition, violations of this Policy may trigger application of sanctions to a colleague imposed under local, state or federal law.

Colleagues are also subject to processes and discipline determined by the Human Resources Department. The HR process is separate and apart from the Sexual Misconduct Response process and not constrained by the outcome of the Sexual Misconduct Response process.

APPEAL

Both parties have the right to appeal a determination regarding responsibility, AUC's dismissal of a Formal Complaint or any allegations therein if: (1) procedural irregularity affected the outcome of the matter; (2) there is newly discovered evidence that could affect the outcome of the matter; (3) a conflict of interest or bias, that affected the outcome of the matter; and/or (4) the proposed Remedy was not reasonable based on the evidence compiled during the investigation

An appeal must be submitted in writing to the Title IX Coordinator within ten days of the delivery of the Written Determination.

RETALIATION PROHIBITED

Retaliation (including intimidation, threats, coercion or discrimination) against an individual for raising an allegation of sexual and/or sex-based misconduct, for cooperating in the investigative is prohibited. If you believe you have been retaliated against, you should follow the procedures outlined in AUC's Retaliation policy located in the Student Handbook. Colleagues should refer to the Retaliation policy located in the Global Employee Handbook.

TRAINING FOR SEXUAL MISCONDUCT RESPONSE PERSONNEL

AUC ensures that its Sexual Misconduct Response personnel have adequate training. The Sexual Misconduct Response Coordinator and Investigators are trained on the definition of Sexual Harassment, the scope of AUC's education Program or Activity, how to conduct an investigation, AUC's grievance process (including hearings, appeals, and informal resolution processes, as applicable) and how to serve impartially by avoiding prejudgment of the facts at issue, conflicts of interest, and bias. Decision-Makers are trained on the definition of Sexual Harassment, the live hearing process, technology to be used in live hearings, and issues of relevance (including how to

apply the rape shield protections provided for Complainants). Informal resolution facilitators are trained on the informal resolution process.

Materials used to train Sexual Misconduct Response personnel are posted on AUC's website and may also be requested directly from the Sexual Misconduct Response Coordinator.

AUC will provide primary prevention and awareness programs to prevent Sexual Assault, Dating Violence, Domestic Violence and Stalking to incoming students and new Colleagues during their first semester.

BIAS/CONFLICT OF INTEREST

To raise any concern involving bias or conflict of interest by the Sexual Misconduct Response Coordinator, contact the Director of the Office of Nondiscrimination and Access, Danica Myers, by phone at 630.829.0233 or by email at ona@adtalem.com. Concerns of bias or potential conflict of interest by any other Title IX personnel should be raised with the Sexual Misconduct Response Coordinator.

TIMELY WARNING REQUIREMENTS

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

Personally identifiable information for victims of Sexual Assault, Dating Violence, Domestic Violence and Stalking will not be included in any publicly available recordkeeping, including Clery Act Reporting and disclosures such as the ASR.

PREVENTION AND AWARENESS

Acts that are deemed to fall within the scope of this Policy are violations of the Codes of Conduct as well as the expectations of members of the AUC community. These acts may also be crimes. In an effort to increase the likelihood of intervention and reduce the risk of sex-based misconduct from occurring among its students and colleagues, AUC is committed to providing primary and ongoing awareness and prevention programming.

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

efforts as well as effective and efficient identification and response when sex-based misconduct does occur.

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

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

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

Ongoing prevention and awareness campaigns are public service announcements and campaigns as well as messages and activities integrated into the day-to-day fabric of the academic community. These initiatives are intended to reinforce increased awareness regarding sex-based misconduct and prevention strategies throughout the year. AUC will continually seek formal and informal ways to incorporate additional awareness and prevention strategies, e.g., active and passive educational campaigns, such as social norms poster campaigns, newsletter articles, presentations and volunteerism with local community resource agencies. When additional ongoing education is provided, the organizer will report that event, activity or effort to the Sexual Misconduct Response Coordinator for record keeping and quality assurance purposes. Toolkits including ideas and resources that support ongoing efforts and are related to the primary prevention and awareness programming, will be made available to any campus upon request.

Risk Reduction Tips

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

- Communicate limits/ boundaries and respect the limits/boundaries of others.
- Clearly and firmly say "No" to a sexual aggressor.
- If possible, leave the physical presence of a sexual aggressor or otherwise violently aggressive person.
- If someone is nearby, ask for help.
- Take responsibility for your alcohol/drug use. Acknowledge that alcohol/drugs lower sexual inhibitions and may make you vulnerable to someone who sees an impaired person as a sexual opportunity.
- Do not take advantage of someone's intoxication or altered state even if alcohol or drugs were consumed willingly.

- If you choose to share intimate images, pictures, videos or content with others, even those you trust, be clear about your expectations regarding how the information may be used, shared or disseminated. If such information is shared with you, do not share it with others.
- Take care of friends and ask that they take care of you.
- As a sexual initiator, clearly communicate your intentions and give your sexual partner the opportunity to clearly communicate the same.
- Do not make assumptions about consent, sexual availability, sexual attraction, how far an interaction can go or about physical and/or mental ability to consent.
- Remember that consent should be affirmative and continuous. If there is any question or ambiguity, you should proceed as if you do not have consent.
- Consider mixed messages from a partner to be an indication that sexual conduct should stop so that better communication can occur.
- Recognize the potential for a sexual partner to feel intimidated or coerced by you as a result of a power advantage, your sex, your demeanor or your physical presence. Do not use or abuse that power.

Bystander Intervention Strategies

Intervention by classmates, colleagues and others within proximity to the precursors or signs of possible sexual assault, sexual exploitation, dating violence, domestic violence or stalking can significantly impact the course of an interaction between a latent perpetrator and victim. Bystanders may also encourage friends, classmates and colleagues who are already experiencing victimization to seek assistance sooner than they may have without encouragement, support or acknowledgment. Community members are encouraged to recognize warning signs and to consider possible methods of interference in various scenarios before opportunities to intervene arise. By planning ahead, we all maximize the likelihood of being empowered to take safe actions to either prevent sexual misconduct or offer paths to eliminate ongoing victimization.

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

- Making up an excuse to get someone out of a dangerous situation.
- Stepping in to change the course of an interaction.
- Warning potential or perceived perpetrators that their actions may lead to severe consequences.
- Refusing to leave the company of a potential victim despite efforts by an aggressor or pursuer to get the potential victim alone.
- Taking steps to reduce alcohol or drug consumption within a potentially dangerous social situation.
- Calling and cooperating with security, administration, the police or others to assist with intervention and accountability.

- Expressing concern or offering resources when you notice someone with unexplained or frequent injuries.
- Refusing to consider sex-based misconduct a personal or private matter between the victim and the perpetrator.

PROCEDURES TO FOLLOW AFTER A SEXUAL MISCONDUCT INCIDENT

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

Whenever possible, victims should report a violation of this Policy as soon as possible and preserve evidence as may be necessary to prove that domestic violence, dating violence, sexual assault or stalking occurred, or to obtain a protection order. Victims of sexual assault or rape are strongly encouraged to report the incident as described in this Policy to deter future assaults and to ensure that victims receive the services they need. Steps should be taken to help deal with physical and emotional trauma associated with the violation. Recommended steps include:

1. Go to a safe place; go somewhere to get emotional support.
2. Consider reporting the incident to the police. Victims are not required to report an incident to law enforcement authorities, but AUC will assist the victim with contacting the police, if requested.
3. Report the misconduct to the manager of student services, sr. manager of campus operations, one-up manager, campus incident commander, local AUC leadership, Sexual Misconduct Response Coordinator or the CRC.
4. For your safety and well-being, immediate medical attention is encouraged. Time is a critical factor for evidence collection and reservation that may assist in proving that the alleged criminal offense occurred or may be helpful in obtaining an order of protection. Being examined as soon as possible, ideally within 120 hours, is important especially in the case of rape and other forms of sexual assault. To preserve evidence, it is recommended that, if at all possible, you do not bathe, shower, douche, eat, drink, smoke, brush your teeth, urinate, defecate or change clothes before that exam. Even if you have already taken any of these actions, you are still encouraged to have prompt medical care. Additionally, you are encouraged to gather bedding, linens or unlaundered clothing and any other pertinent articles that may be used for evidence. Secure them in a clean paper bag or clean sheet. Completing a forensic examination does not require someone to file a police report. To find a location near you that performs free forensic examinations, call the National Sexual Assault Hotline at (800) 656-4673. Resources are also available through the Rape Abuse & Incest National Network (RAINN); www.RAINN.org.
5. Even after the immediate crisis has passed, consider seeking professional counseling and the support of local and specialized support agencies, such as sexual assault

recovery centers and domestic violence safe houses. This can help to recover from the psychological effects and provide a safe environment for recovery.

POLICY ON NON-DISCRIMINATION

As set out in the Student Handbook, Faculty Manual and Staff Handbook, the University maintains a policy of non-discrimination regardless of race, color, religion, age, sex, disability, national origin, or sexual orientation. It is the responsibility of every employee and student in the University community to conduct him or herself in a manner that contributes to an environment free of discrimination on the basis of any of these prohibited grounds. 1.3 Discriminatory conduct by a student or employee sufficient to create a hostile environment (“Harassment”) will be subject to discipline in accordance with the University’s Administrative Review and Grievance Procedures. Such conduct violates both law and University policy, and it will not be tolerated in the University community. What is Discrimination?

For purposes of this Policy, discrimination is conduct or behavior directed toward a student or employee of the University that is based on any actual or perceived trait or characteristic that is protected under the University’s Non-Discrimination Policy.

What is Harassment?

Harassment is a form of discrimination. Harassment does not have to include intent to harm, be directed at a specific target, or involve repeated incidents. Harassment creates a hostile environment when conduct is sufficiently severe, pervasive or persistent so as to interfere with an individual’s work or academic performance or creates an intimidating, hostile, or offensive environment. Examples of words or conduct that may constitute harassment that would violate this Policy are:

- Verbal abuse, slurs, derogatory comments or insults about, directed at, or made in the presence of an individual or group based on protected status. This could include telephone calls, emails, instant messages, etc.
- Display or circulation of written materials or pictures that are degrading to a person or group based on protected status.
- Damage to, trespass on or unauthorized use of property, such as spraying or scratching of a motor vehicle, damage or theft of property, based upon the protected status of an individual or group.
- Physical contact or verbal threats based upon the protected status of an individual or group.

WHOM TO CONTACT IF YOU THINK YOU HAVE BEEN DISCRIMINATED AGAINST OR HARASSED

The Student Service Manager, Dean of Campus Operations Program Dean/Director and/or Dean of Academic Affairs are available to serve as a resource to any student or other member of the AUC community who has a discrimination or harassment inquiry or complaint. These resource persons have information about AUC’s non-discrimination policy, rules and procedures (including

information about confidentiality) as well as options available for the investigation and resolution of complaints. Individuals with a discrimination or harassment inquiry or complaint may be more comfortable speaking with someone of the same sex, and the resource persons listed can assist in finding help of the preferred sex.

Students who wish to file discrimination or harassment complaints against AUC should follow the Student Complaint/Grievance Procedure found in this handbook.

Students who wish to file discrimination or harassment complaints against a fellow student should follow the Professional Conduct Procedure found in this handbook.

Complaints involving discrimination or harassment should be reported to Danica Myers, Director, Office of Nondiscrimination and Access (**ona@adtalem.com** or **630.829.0233**).

CAMPUS SEX CRIMES PREVENTION ACT

The Campus Sex Crimes Prevention Act requires sex offenders already required to register in a State to provide notice, as required under State law, to each institution of higher education in that state at which the person is employed, carries on a vocation, or is a student. The act requires that state procedures ensure this registration information is promptly made available to law enforcement agencies with jurisdiction where the institutions of higher education are located and that it is entered into appropriate state records or data systems. These changes became effective two years after enactment of the law (2002).

This act amends the Higher Education Act of 1965 to require institutions of higher education to issue a statement, in addition to other disclosures required under that Act, advising the campus community where law enforcement agency information provided by a State concerning registered sex offenders may be obtained. This change takes effect two years after enactment (2002).

This act amends the Family Educational Rights and Privacy Act of 1974 to clarify that nothing in that Act may be construed to prohibit an educational institution from disclosing information provided to the institution concerning registered sex offenders; requires the Secretary of Education to take appropriate steps to notify educational institutions that disclosure of this information is permitted.

To check registered sex offenders in a state see the State Sexual Offender Registry List section.

STATE SEXUAL OFFENDER REGISTRY LIST

ALABAMA

Website:

http://sheriffalerts.com/cap_office_disclaimer.php?office=54247&fwd=aHR0cDovL3d3dy5jb21tdW5pdHlub3RpZmljYXRpb24uY29tL2NhcF9tYWluLnBocD9vZmZpY2U9NTQyNDc=

Phone Number: 334-676-7250

ALASKA

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

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

ARIZONA

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

Phone Number: 602-255-0611

ARKANSAS

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

Phone Number: 501-682-2222

CALIFORNIA

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

Phone Number: 916-327-5413

COLORADO

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

Phone Number: 303-239-4201

CONNECTICUT

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

Phone Number: 860-685-8060

DELAWARE

Website: <https://sexoffender.dsp.delaware.gov/>
Phone Number: 302-739-5882

DISTRICT OF COLUMBIA

Website: <http://sexoffender.dc.gov/>
Phone Number: 202-727-4407

FLORIDA

Website: <https://offender.fdle.state.fl.us/offender/sops/offenderSearch.jsf>
Phone Number: 888-357-7332

GEORGIA

Website: <https://gbi.georgia.gov/services/georgia-sex-offender-registry>
Primary: (404) 270-8465
Phone: (404) 270-8622
Email Link: gcicsexoffenders@gbi.ga.gov

HAWAII

Website: <http://sexoffenders.ehawaii.gov/sexoffender/welcome.html>
Phone Number: 808-587-3350

IDAHO

Website: http://www.isp.idaho.gov/sor_id/
Phone Number: 208-884-7305

ILLINOIS

Website: <https://isp.illinois.gov/Sor>
Phone Number: 217-785-0653

INDIANA

Website: <http://www.icrimewatch.net/indiana.php>
Phone Number: 800-622-4779

IOWA

Website: <http://www.iowasexoffender.com/>
Phone Number: 515-725-6050

KANSAS

Website: [Public Offender Registry \(ks.gov\)](http://PublicOffenderRegistry.ks.gov)
Phone Number: 785-296-2841

KENTUCKY

Website: <http://kspsor.state.ky.us/>
Phone Number: 502-227-8700

LOUISIANA

Website: <https://www.icrimewatch.net/louisiana.php>
Phone Number: 800-858-0551

MAINE

Website: <http://sor.informe.org/cgi-bin/sor/index.pl>
Phone Number: 207-624-7270

MARYLAND

Website: [DPSCS - Sex Offender Registry \(state.md.us\)](http://DPSCS-SexOffenderRegistry.state.md.us)

Phone Number: 410-585-3600

MASSACHUSETTS

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

Phone Number: 978-740-6400

MICHIGAN

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

Phone Number: 517-241-1806

MINNESOTA

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

Phone Number: 651-361-7200

MISSISSIPPI

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

Phone Number: 601-987-1540

MISSOURI

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

Phone Number: 888-767-6747

MONTANA

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

Phone Number: 406-444-7068

NEBRASKA

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

Phone Number: 402-471-8647

NEVADA

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

Phone Number: 775-684-6262

NEW HAMPSHIRE

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

Phone Number: 800-735-2964

NEW JERSEY

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

Phone Number: 609-882-2000

NEW MEXICO

Website:

http://sheriffalerts.com/cap_office_disclaimer.php?office=55290&fwd=aHR0cDovL2NvbW11bml0eW5vdGlmaWNhdGlvb20vY2FwX21haW4ucGhwP29mZmljZT01NTI5MA==

Phone Number: 505-827-9297

NEW YORK

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

Phone Number: 800-262-3257

NORTH CAROLINA

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

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

NORTH DAKOTA

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

Phone Number: 701-328-5500

OHIO

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

Phone Number: 866-406-4534

OKLAHOMA

Website: [Search \(ok.gov\)](http://www.ok.gov)

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

OREGON

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

Phone Number: 503-934-1258

PENNSYLVANIA

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

Phone Number: 866-771-3170

PUERTO RICO

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

Phone Number: 787-721-2900

RHODE ISLAND

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

Phone Number: 401-764-5900

SOUTH CAROLINA

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

Phone Number: 803-896-2601

SOUTH DAKOTA

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

Phone Number: 605-773-3331

TENNESSEE

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

Phone Number: 888-837-4170

Email: tbisormgr@tn.gov

TEXAS

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

Phone Number: 512-424-2800

UTAH

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

Phone Number: 801-495-7700

VERMONT

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

Phone Number: 802-241-5400

VIRGINIA

Website: [Search - Virginia State Police \(vsp.or.gov\)](http://www.vsp.or.gov)

Phone Number: 804-674-2825

WASHINGTON

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

Phone Number: 360-486-2386

WEST VIRGINIA

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

Phone Number: 304-746-2133

WISCONSIN

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

Phone Number: 608-240-5830

WYOMING

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

Phone Number: 307-777-7181

ALCOHOL AND SUBSTANCE ABUSE POLICY

AUC maintains a drug-free campus and professional life policy. All medical students must be free of substances of abuse at all times when enrolled in the program in any location.

AUC expects its students to maintain an environment that is safe and healthy. The possession, use, or distribution of illegal drugs by students on AUC property or as a part of a student-sponsored AUC off-campus activity are violations of university rules. Alcohol is not permitted on AUC's SXM campus, campus shuttle, or AUC-sponsored event transportation (e.g., chartered vans and buses). Specific permission for alcohol use at some student-sponsored off-campus events may be granted by contacting the appropriate Student Affairs Dean. Possession, use, or distribution of certain nonprescription drugs, including marijuana, amphetamines, heroin, cocaine, and nonprescription synthetics; procurement or distribution of alcohol by anyone under 21 years of age; and provision of alcohol to anyone under 21 years of age are also violations of the law and of AUC policy. Regardless of any local laws related to the possession and consumption of marijuana under certain circumstances, AUC prohibits the possession, use, or distribution of marijuana, including for medical purposes, at any point during enrollment at the University. Thus, even if possession or use of marijuana would be permitted under local law, it remains prohibited by AUC.

AUC's policies and procedures also reflect additional expectations for student conduct based on our concerns about high-risk drinking behaviors, such as binge drinking and the rapid or competitive consumption of alcohol, and their many adverse consequences for students' health and lives. All students are expected to comply with local laws and AUC rules governing possessing or serving alcohol. The University holds its students responsible for the consequences of their decisions to use or distribute illicit drugs or to serve or consume alcohol. Additionally, the misuse of prescription drugs (sharing, buying, or using in a manner different than prescribed) is a violation of university policy.

The University expects students to make responsible choices and create safe social environments. AUC will take serious action, up to and including dismissal from the University, in any case involving the possession in quantity or the sale or distribution of drugs, or when cases of drug and alcohol use create a danger to individuals or to the community at large. If a person was seriously harmed, or could have been seriously harmed, as a result of consuming drugs or alcohol provided by another person, then AUC may take disciplinary action against the person who provided the drugs or alcohol, up to and including requirement to withdraw. AUC has adopted a Help-Seeking Policy, as set forth below.

AUC's Medical Sciences campuses and clinical rotation sites may require students enrolled in Medical Sciences courses or clinical clerkships to consent to random or mandatory drug tests. Failing or refusing a drug test requested

on campus or at a clinical site may result in disciplinary action, up to and including immediate dismissal from the medical education program at AUC. Students should be aware that their matriculation is contingent upon acceptance of any drug screening program whether universal or random imposed by the school. Violation of this policy does not require AUC to use the Student Conduct Complaint and Appeal Policy to impose discipline. A student testing positive for banned substances may be immediately dismissed from the clinical site at the discretion of the clinical site, usually permanently and without the possibility of negotiation. All such dismissals result in non-academic leaves.

Any student that is the subject of disciplinary proceedings while enrolled at AUC may be subject to an additional background check and drug screening conducted by the school. Submitting a false or misleading statement on any document, including background information, to AUC will constitute grounds for dismissal. AUC reserves the right to conduct random drug tests at any time on any enrolled student.

AUC is required to report all such leaves related to alcohol or substance abuse to the ECFMG upon the student's graduation. This can have deleterious effects on ultimate licensure. Students should be aware that the half-life of marijuana is long, and the drug may be detectable in the body for as long as two months. This makes the social use of marijuana unacceptable in a medical student's career. Students should be aware that recent ingestion of poppy seeds may cause urine drug testing to be positive for opiates.

HELP-SEEKING POLICY: AUC expects students to abide by the law and AUC policy on the use of drugs and alcohol. The University is not a sanctuary from the existing laws of the local, city, state, or federal government, and students must recognize the consequences of their personal decisions as well as the impact those decisions can have on themselves, others, and the wider AUC community. However, in cases of active drug or alcohol intoxication, health and safety are the University's primary concerns, and this policy is intended to encourage students to seek help. Students seeking medical treatment for themselves, or another person related to an active intoxication from drug or alcohol use will not be subject to disciplinary action from AUC for violations pertaining to the use of drugs or alcohol related to the active intoxication. Sources of help might include wellness counselors or other medical providers; resident assistants; and AUC Safety and Security officers. This policy does not provide immunity from disciplinary action relating to any other conduct violations, including, without limitation, assault, property damage, or the possession in quantity or the sale or distribution of drugs.

DRUG FREE SCHOOLS & COMMUNITIES ACT

Educational Guidelines Pertaining to Drug Free Schools & Communities Act

AUC expects all members of its community including students, faculty and staff, to be familiar with and to abide by applicable state, federal and local laws regarding alcohol and drugs. Students are also responsible for knowing school regulations concerning alcohol use on campus. AUC forbids the unauthorized use, possession, distribution or sale of drugs or alcohol by a student anywhere on AUC property. Violation of these laws or regulations may subject a student to both criminal prosecution and campus disciplinary action.

Use of illicit drugs and abuse of prescription drugs pose a serious threat to mental and physical health. Alcohol is a drug. Its use in even the smallest amounts may be harmful to some people, and when used to excess, alcohol is harmful to everyone. For this reason, responsible drinking is essential and is expected of those who choose to drink.

Substance

Alcohol (at .08 Blood Alcohol Concentration & Above)

Impaired motor abilities; reduced judgment; sleepiness; increased sexual desire but reduced ability to perform; nausea, vomiting; liver disorders-alcoholic hepatitis, alcoholic cirrhosis; cancer of the-tongue, mouth, throat, esophagus, liver, breast; fetal alcohol syndrome (most common symptom is mental retardation).

Cannabis Marijuana Hash/Hash Oil THC

Diminished-short term memory, motivation & cognition, coordination & concentration, oral communication, reaction time; anxiety & panic reactions; carcinogenic elements in smoke; damaged lungs & respiratory system.

Cocaine (includes Crack Cocaine)

Increased likelihood of risk taking; seizures; sleeplessness; paranoia; irregular heartbeat; can cause sudden death by stroke or heart failure, even in young users; cocaine psychosis (paranoia & hallucinations); ulceration of mucous

membranes in the nose; sexual dysfunction; during pregnancy can cause severe physical & emotional problems in babies.

Depressants, Tranquilizers, Barbiturates, Methaqualone

Dangerous effects when mixed with alcohol; calmness & relaxed muscles; slurred speech, staggering gait, loss of motor coordination; altered perceptions; respiratory depression which can result in coma or death; disruption of normal sleep cycle; during pregnancy-birth defects, brain tumors in children; tolerance develops severe withdrawal symptoms; physical & psychological dependence.

Other Stimulants (Excluding Cocaine), Amphetamines, Methamphetamines

Increased heart & respiratory rates; elevated blood; decreased appetite; headaches; blurred vision; dizziness; sleeplessness; anxiety; amphetamine psychosis-violent behavior, hallucinations, delusions, paranoia; drug tolerance & dependency; mood swings; ulcers; mental confusion.

Psychedelics, LSD, Mescaline, Psilocybin, Phencyclidine (PCP), MDMA (Ecstasy), MDA

Distorted sense of distance, space and time; blockage of pain sensations; nausea, vomiting & diarrhea; severe mood disorders, panic depression, anxiety; greater suggestibility & feelings of invulnerability; unpredictable reactions if drugs are "cut" with impurities; tolerance after (3-4 daily doses--higher doses are required to produce same effects).

Narcotics, Opium, Morphine, Codeine, Thebaine, Heroin, Methadone, Darvon, Demerol

Feeling of euphoria followed by drowsiness; nausea & vomiting; respiratory depression; central nervous system depression; use of unsterile needles promotes-AIDS, hepatitis B, endocarditis (infection in the heart); women dependent on opiates have multiple pregnancy complications-spontaneous abortions, still births, anemia, diabetes.

LAWS REGARDING ALCOHOL AND DRUGS

ST. MAARTEN - NATIONAL

Federal law penalizes the unlawful manufacturing, distribution, use, sale, and possession of controlled substances. List of controlled substances can be found in the Opiumlandsveroderning National Ordinance Article 3 and 4, otherwise referred to as the Opium Ordinance, and includes all substances listed in the above section. The Opium Ordinance has a strict prohibition against the cultivation of marijuana, coca (genus Erythroxylon), and opium (species Papaver somniferum L.).

The HEA suspends financial aid eligibility for students who have been convicted under federal or state law of the sale or possession of drugs, if the offense occurred during a period of enrollment for which the student was receiving federal student aid (grants, loans, and/or work-study). Any student, who has a conviction(s) for these offenses, is advised to call the Federal Student Aid Information Center at 1-800-4-FED-AID (1-800-433-3243) or go to <http://www.fafsa.ed.gov/>, click on "Before Beginning A FAFSA", then click on "Student Aid Eligibility Worksheet" to find out how this law applies.

If a student has lost federal student aid eligibility due to a drug conviction, he or she may regain eligibility by passing two unannounced drug tests conducted by a drug rehabilitation program that complies with criteria established by the U.S. Department of Education.

FEDERAL

Title 21 United States Code (USC) Controlled Substances Act

Part D — Offenses and Penalties

§841. Prohibited acts A

(a) Unlawful acts

Except as authorized by this subchapter, it shall be unlawful for any person knowingly or intentionally—

(1) to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance; or

(2) to create, distribute, or dispense, or possess with intent to distribute or dispense, a counterfeit substance.

b) Penalties

Except as otherwise provided in section 849, 859, 860, or 861 of this title, any person who violates subsection (a) of this section shall be sentenced as follows:

(1)(A) In the case of a violation of subsection (a) of this section involving—

- (i) 1 kilogram or more of a mixture or substance containing a detectable amount of heroin;
- (ii) 5 kilograms or more of a mixture or substance containing a detectable amount of—
 - (I) coca leaves, except coca leaves and extracts of coca leaves from which cocaine, ecgonine, and derivatives of ecgonine or their salts have been removed;
 - (II) cocaine, its salts, optical and geometric isomers, and salts of isomers;
 - (III) ecgonine, its derivatives, their salts, isomers, and salts of isomers; or
 - (IV) any compound, mixture, or preparation which contains any quantity of any of the substances referred to in subclauses (I) through (III);
- (iii) 280 grams or more of a mixture or substance described in clause (ii) which contains cocaine base;
- (iv) 100 grams or more of phencyclidine (PCP) or 1 kilogram or more of a mixture or substance containing a detectable amount of phencyclidine (PCP);
- (v) 10 grams or more of a mixture or substance containing a detectable amount of lysergic acid diethylamide (LSD);
- (vi) 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide or 100 grams or more of a mixture or substance containing a detectable amount of any analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide;
- (vii) 1000 kilograms or more of a mixture or substance containing a detectable amount of marihuana, or 1,000 or more marihuana plants regardless of weight; or
- (viii) 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers or 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers;

such person shall be sentenced to a term of imprisonment which may not be less than 10 years or more than life and if death or serious bodily injury results from the use of such substance shall be not less than 20 years or more than life, a fine not to exceed the greater of that authorized in accordance with the provisions of title 18 or \$10,000,000 if the defendant is an individual or \$50,000,000 if the defendant is other than an individual, or both. If any person commits such a violation after a prior conviction for a felony drug offense has become final, such person shall be sentenced to a term of imprisonment which may not be less than 20 years and not more than life imprisonment and if death or serious bodily injury results from the use of such substance shall be sentenced to life imprisonment, a fine not to exceed the greater of twice that authorized in accordance with the provisions of title 18 or \$20,000,000 if the defendant is an individual or \$75,000,000 if the defendant is other than an individual, or both. If any person commits a violation of this subparagraph or of section 849, 859, 860, or 861 of this title after two or more prior convictions for a felony drug offense have become final, such person shall be sentenced to a mandatory term of life imprisonment without release and fined in accordance with the preceding sentence. Notwithstanding section 3583 of title 18, any sentence under this subparagraph shall, in the absence of such a prior conviction, impose a term of supervised release of at least 5 years in addition to such term of imprisonment and shall, if there was such a prior conviction, impose a term of supervised release of at least 10 years in addition to such term of imprisonment. Notwithstanding any other provision of law, the court shall not place on probation or suspend the sentence of any person sentenced under this subparagraph. No person sentenced under this subparagraph shall be eligible for parole during the term of imprisonment imposed therein.

(B) In the case of a violation of subsection (a) of this section involving—

- (i) 100 grams or more of a mixture or substance containing a detectable amount of heroin;
- (ii) 500 grams or more of a mixture or substance containing a detectable amount of—
 - (I) coca leaves, except coca leaves and extracts of coca leaves from which cocaine, ecgonine, and derivatives of ecgonine or their salts have been removed;
 - (II) cocaine, its salts, optical and geometric isomers, and salts of isomers;
 - (III) ecgonine, its derivatives, their salts, isomers, and salts of isomers; or

- (IV) any compound, mixture, or preparation which contains any quantity of any of the substances referred to in subclauses (I) through (III);
- (iii) 28 grams or more of a mixture or substance described in clause (ii) which contains cocaine base;
 - (iv) 10 grams or more of phencyclidine (PCP) or 100 grams or more of a mixture or substance containing a detectable amount of phencyclidine (PCP);
 - (v) 1 gram or more of a mixture or substance containing a detectable amount of lysergic acid diethylamide (LSD);
 - (vi) 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propanamide or 10 grams or more of a mixture or substance containing a detectable amount of any analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide;
 - (vii) 100 kilograms or more of a mixture or substance containing a detectable amount of marihuana, or 100 or more marihuana plants regardless of weight; or
 - (viii) 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers or 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers;

such person shall be sentenced to a term of imprisonment which may not be less than 5 years and not more than 40 years and if death or serious bodily injury results from the use of such substance shall be not less than 20 years or more than life, a fine not to exceed the greater of that authorized in accordance with the provisions of title 18 or \$5,000,000 if the defendant is an individual or \$25,000,000 if the defendant is other than an individual, or both. If any person commits such a violation after a prior conviction for a felony drug offense has become final, such person shall be sentenced to a term of imprisonment which may not be less than 10 years and not more than life imprisonment and if death or serious bodily injury results from the use of such substance shall be sentenced to life imprisonment, a fine not to exceed the greater of twice that authorized in accordance with the provisions of title 18 or \$8,000,000 if the defendant is an individual or \$50,000,000 if the defendant is other than an individual, or both. Notwithstanding section 3583 of title 18, any sentence imposed under this subparagraph shall, in the absence of such a prior conviction, include a term of supervised release of at least 4 years in addition to such term of imprisonment and shall, if there was such a prior conviction, include a term of supervised release of at least 8 years in addition to such term of imprisonment. Notwithstanding any other provision of law, the court shall not place on probation or suspend the sentence of any person sentenced under this subparagraph. No person sentenced under this subparagraph shall be eligible for parole during the term of imprisonment imposed therein.

(C) In the case of a controlled substance in schedule I or II, gamma hydroxybutyric acid (including when scheduled as an approved drug product for purposes of section 3(a)(1)(B) of the Hillory J. Farias and Samantha Reid Date-Rape Drug Prohibition Act of 2000), or 1 gram of flunitrazepam, except as provided in subparagraphs (A), (B), and (D), such person shall be sentenced to a term of imprisonment of not more than 20 years and if death or serious bodily injury results from the use of such substance shall be sentenced to a term of imprisonment of not less than twenty years or more than life, a fine not to exceed the greater of that authorized in accordance with the provisions of title 18 or \$1,000,000 if the defendant is an individual or \$5,000,000 if the defendant is other than an individual, or both. If any person commits such a violation after a prior conviction for a felony drug offense has become final, such person shall be sentenced to a term of imprisonment of not more than 30 years and if death or serious bodily injury results from the use of such substance shall be sentenced to life imprisonment, a fine not to exceed the greater of twice that authorized in accordance with the provisions of title 18 or \$2,000,000 if the defendant is an individual or \$10,000,000 if the defendant is other than an individual, or both. Notwithstanding section 3583 of title 18, any sentence imposing a term of imprisonment under this paragraph shall, in the absence of such a prior conviction, impose a term of supervised release of at least 3 years in addition to such term of imprisonment and shall, if there was such a prior conviction, impose a term of supervised release of at least 6 years in addition to such term of imprisonment. Notwithstanding any other provision of law, the court shall not place on probation or suspend the sentence of any person sentenced under the provisions of this subparagraph which provide for a mandatory term of imprisonment if death or serious bodily injury results, nor shall a person so sentenced be eligible for parole during the term of such a sentence.

(D) In the case of less than 50 kilograms of marihuana, except in the case of 50 or more marihuana plants regardless of weight, 10 kilograms of hashish, or one kilogram of hashish oil, such person shall, except as provided in paragraphs (4) and (5) of this subsection, be sentenced to a term of imprisonment of not more than 5 years, a fine not to exceed the greater of that authorized in accordance with the provisions of title 18 or \$250,000 if the

defendant is an individual or \$1,000,000 if the defendant is other than an individual, or both. If any person commits such a violation after a prior conviction for a felony drug offense has become final, such person shall be sentenced to a term of imprisonment of not more than 10 years, a fine not to exceed the greater of twice that authorized in accordance with the provisions of title 18 or \$500,000 if the defendant is an individual or \$2,000,000 if the defendant is other than an individual, or both. Notwithstanding section 3583 of title 18, any sentence imposing a term of imprisonment under this paragraph shall, in the absence of such a prior conviction, impose a term of supervised release of at least 2 years in addition to such term of imprisonment and shall, if there was such a prior conviction, impose a term of supervised release of at least 4 years in addition to such term of imprisonment.

(E)(i) Except as provided in subparagraphs (C) and (D), in the case of any controlled substance in schedule III, such person shall be sentenced to a term of imprisonment of not more than 10 years and if death or serious bodily injury results from the use of such substance shall be sentenced to a term of imprisonment of not more than 15 years, a fine not to exceed the greater of that authorized in accordance with the provisions of title 18 or \$500,000 if the defendant is an individual or \$2,500,000 if the defendant is other than an individual, or both.

(ii) If any person commits such a violation after a prior conviction for a felony drug offense has become final, such person shall be sentenced to a term of imprisonment of not more than 20 years and if death or serious bodily injury results from the use of such substance shall be sentenced to a term of imprisonment of not more than 30 years, a fine not to exceed the greater of twice that authorized in accordance with the provisions of title 18 or \$1,000,000 if the defendant is an individual or \$5,000,000 if the defendant is other than an individual, or both.

(iii) Any sentence imposing a term of imprisonment under this subparagraph shall, in the absence of such a prior conviction, impose a term of supervised release of at least 2 years in addition to such term of imprisonment and shall, if there was such a prior conviction, impose a term of supervised release of at least 4 years in addition to such term of imprisonment.

(2) In the case of a controlled substance in schedule IV, such person shall be sentenced to a term of imprisonment of not more than 5 years, a fine not to exceed the greater of that authorized in accordance with the provisions of title 18 or \$250,000 if the defendant is an individual or \$1,000,000 if the defendant is other than an individual, or both. If any person commits such a violation after a prior conviction for a felony drug offense has become final, such person shall be sentenced to a term of imprisonment of not more than 10 years, a fine not to exceed the greater of twice that authorized in accordance with the provisions of title 18 or \$500,000 if the defendant is an individual or \$2,000,000 if the defendant is other than an individual, or both. Any sentence imposing a term of imprisonment under this paragraph shall, in the absence of such a prior conviction, impose a term of supervised release of at least one year in addition to such term of imprisonment and shall, if there was such a prior conviction, impose a term of supervised release of at least 2 years in addition to such term of imprisonment.

(3) In the case of a controlled substance in schedule V, such person shall be sentenced to a term of imprisonment of not more than one year, a fine not to exceed the greater of that authorized in accordance with the provisions of title 18 or \$100,000 if the defendant is an individual or \$250,000 if the defendant is other than an individual, or both. If any person commits such a violation after a prior conviction for a felony drug offense has become final, such person shall be sentenced to a term of imprisonment of not more than 4 years, a fine not to exceed the greater of twice that authorized in accordance with the provisions of title 18 or \$200,000 if the defendant is an individual or \$500,000 if the defendant is other than an individual, or both. Any sentence imposing a term of imprisonment under this paragraph may, if there was a prior conviction, impose a term of supervised release of not more than 1 year, in addition to such term of imprisonment.

(4) Notwithstanding paragraph (1)(D) of this subsection, any person who violates subsection (a) of this section by distributing a small amount of marihuana for no remuneration shall be treated as provided in section 844 of this title and section 3607 of title 18.

(5) Any person who violates subsection (a) of this section by cultivating or manufacturing a controlled substance on Federal property shall be imprisoned as provided in this subsection and shall be fined any amount not to exceed—

- (A) the amount authorized in accordance with this section;
- (B) the amount authorized in accordance with the provisions of title 18;
- (C) \$500,000 if the defendant is an individual; or
- (D) \$1,000,000 if the defendant is other than an individual;

or both.

(6) Any person who violates subsection (a) of this section, or attempts to do so, and knowingly or intentionally uses a poison, chemical, or other hazardous substance on Federal land, and, by such use—

(A) creates a serious hazard to humans, wildlife, or domestic animals,

(B) degrades or harms the environment or natural resources, or

(C) pollutes an aquifer, spring, stream, river, or body of water,

shall be fined in accordance with title 18 or imprisoned not more than five years, or both.

(7) Penalties for distribution.—

(A) In general.—Whoever, with intent to commit a crime of violence, as defined in section 16 of title 18 (including rape), against an individual, violates subsection (a) of this section by distributing a controlled substance or controlled substance analogue to that individual without that individual's knowledge, shall be imprisoned not more than 20 years and fined in accordance with title 18.

(B) Definition.—For purposes of this paragraph, the term "without that individual's knowledge" means that the individual is unaware that a substance with the ability to alter that individual's ability to appraise conduct or to decline participation in or communicate unwillingness to participate in conduct is administered to the individual.

SCHOOL SANCTIONS **

(APPLIED TO ALL CATEGORIES OF SUBSTANCES)

STUDENTS

AUC's Medical Sciences campus and clinical rotation sites routinely require students enrolled in Medical Sciences courses or clinical clerkships to consent to random drug tests. Selection for drug testing at the Medical Sciences campus is random and a student may be selected more than once. Failing or refusing a random drug test may result in disciplinary action, up to and including dismissal from the medical education program. Students should be aware that their matriculation is contingent upon acceptance of any drug screening program whether universal or random imposed by the school. Failing a drug test or refusing to comply with a drug test will be grounds for discipline, up to and including immediate dismissal from AUC. Violation of this policy does not require AUC use the Administrative Review Process to impose discipline. A student testing positive for banned substances will be immediately dismissed from the clinical site at the discretion of the clinical site, usually permanently and without the possibility of negotiation. All such dismissals result in non-academic leaves.

Any student that is the subject of disciplinary proceedings while enrolled at AUC may be subject to an additional background check and drug screening conducted by the school. Submitting a false or misleading statement on any document, including background information, to AUC will constitute grounds for dismissal. AUC reserves the right to conduct random drug tests at any time on any enrolled student.

AUC is required to report all such leaves related to alcohol or substance abuse to the ECFMG upon the student's graduation. This can have deleterious effects on ultimate licensure. Students should be aware that the half-life of marijuana is long, and the drug may be detectable in the body for as long as two months. This makes the social use of marijuana unacceptable in a medical student's career. Students should be aware that recent ingestion of poppy seeds may cause urine drug testing to be positive for opiates.

FACULTY AND STAFF

Colleagues of the institution are prohibited from:

- Possession, use or sale of illegal drugs or substances
- Possession on organization premises of open containers of alcoholic beverages, or drinking on the premises, except at organization-approved events
- Providing alcoholic beverages to underage students

Sanctions for this violation could lead up to termination of employment.

**These sanctions are in addition to any criminal sanctions that may be imposed. Student colleagues are subject to both colleague and student sanctions.

LOCAL TREATMENT RESOURCES

The following is a sampling of local area information and treatment resources. A more comprehensive listing of available counseling and treatment programs can be obtained in the Student Central.

Narcotics/Alcoholics Anonymous

(721)-520-5169

<https://www.aacaribbean.org/st.martin.html>

STUDENT CODE OF CONDUCT

PROFESSIONAL CONDUCT POLICY

As members of the AUC community and indicated in the EPAs described previously, all students, groups of students, and student organizations are expected to exemplify and engage in socially responsible behavior befitting physicians-in-training, and to model exceptional conduct, character, and service to others on campus and beyond. When learning of conduct or behavior that may not meet these standards, community members are expected to take an active role in upholding our community principles and values by contacting AUC officials; confront the situation as it occurs; or speak directly to the individuals involved.

SCOPE

The Professional Conduct Policy applies to the following situations. AUC reserves the right to investigate and resolve reports of alleged misconduct in all of these situations:

- Involving students, a group of students, or a student organization
- Occurring from the time of a student's application for admission through the actual awarding of a medical degree (even if the conduct is not discovered until after a degree is awarded), including, but not limited to:
 - During the academic year
 - Before classes begin or after classes end
 - During both Medical and Clinical Sciences
 - While on leave from AUC
- Occurring either on or off campus

AUC reserves the right to investigate and resolve any report or incident in which a student is alleged to violate any of the principles or policies published by the university or local, state, or federal laws or policies, regardless of the location where the incident occurs. Students are also expected to follow the policies and procedures of institutions and clinical sites that they may visit, including during international travel.

AUC visitors and guests are expected to follow all university policies. Student hosts are accountable for the conduct of their guests and may be subject to disciplinary action as the responsible party for violations of university policy incurred by their guests.

STUDENT HONOR CODE

I, in order to foster an environment conducive to the exchange of information and ideas, am expected, as a member of the American University of the Caribbean School of Medicine community, to conduct myself according to the standards of the medical profession, university policies, and the laws set forth by the jurisdiction in which I reside. This honor code serves as a charter by which the university governs itself. I must uphold the virtues of honesty, fairness, and self-discipline in all of my affairs and refrain from biases including but not limited to: race, sex, age, sexual orientation, disability, and religion. Unethical or unprofessional behaviors will be assessed and will lead to consequences in accordance with university policies. I will sign and uphold the honor code throughout my enrollment at AUC.

CONDUCT VIOLATIONS

Any student found to have engaged in the following acts of misconduct may be subject to administrative review. This list is not all-inclusive but includes categories of misconduct as defined by AUC.

1. Acts of dishonesty, including but not limited to the following:
 - a. Furnishing false information to any AUC official, faculty member or office
 - b. Forgery, alteration or misuse of any AUC document, record or instrument of identification
 - c. Computer piracy, including duplication of computer software, copyright infringement and unauthorized computer entry
2. Disruption or obstruction of teaching, research, administration, disciplinary proceedings and/or other AUC activities, including its public service functions on or off campus, or other authorized non-AUC activities.
3. Physical abuse, verbal abuse, threats, intimidation, and harassment including, but not limited to, sexual harassment, gender-based harassment, coercion and/or other conduct that threatens or endangers the health or safety of any person, either on or off AUC premises or at any AUC-sponsored activity.
4. Attempted or actual theft of and/or damage to property of the AUC or property of a member of the AUC community or other personal or public property.
5. Gambling on AUC premises, at AUC functions or through the use of AUC's equipment.
6. Failure to comply with directions of AUC officials or law enforcement officers acting in performance of their duties. Failure to identify oneself to these persons by producing an AUC issued ID or other recognized form of ID such as a driver's license or state issued ID when requested to do so.
7. Unauthorized possession, duplication or use of keys to any part of AUC premises, or unauthorized entry to or use of AUC premises.
8. Unauthorized recording of conversations, telephonic or otherwise. Students may not record conversations without notifying and obtaining permission of the conversation participants prior to initiating the recording.
9. Violation of published AUC's policies, rules or regulations.
10. Violation of federal, state, or local law on AUC premises or at AUC-sponsored or AUC-supervised activities or other violation of federal, state, or local law which has an adverse effect on the AUC community. If a student is charged with an off-campus violation of federal, state or local law, Administrative Review proceedings may be initiated if the violation of law holds the potential of an adverse impact on the AUC community. AUC proceedings may be instituted against a student charged with violation of a federal, state, or local law that is also a violation of the Professional Code of Conduct (for example, if both violations result from the same factual situation), without regard to the pendency of civil litigation or criminal arrest and prosecution. Proceedings for violations of the Professional Code of Conduct may be carried out prior to, simultaneously with or following civil or criminal proceedings off campus. When a student is charged by federal, state or local authorities with a violation of law, AUC may or may not, at its discretion, request or agree to special consideration for that individual because of his/her status as a student. If the alleged offense is also the subject of proceeding before a judicial body, AUC may advise off-campus authorities of the existence of the Professional Code of Conduct and of how such matters will be handled internally with the AUC community. AUC will cooperate fully with law enforcement and other agencies in enforcing criminal law on AUC property and in the conditions imposed by criminal courts for rehabilitation of student violators. Individual student or faculty members, acting in their personal capacities, remain free to interact with a governmental representative or law enforcement official as they deem appropriate.
11. Illegal or unauthorized possession of firearms, explosives, other weapons or dangerous materials.
12. Aiding, abetting or inducing another to commit a violation of the Professional Code of Conduct.
13. Conduct that is provocative, aggressive or in violation of AUC's standards for professional behavior, including but not limited to:
 - a. Communicating any messages that contain derogatory statements about any group, race or ethnicity
 - b. Communicating any inflammatory statements related to personal, political, religious or ethical views
 - c. Communicating any message that contains aggressive, abusive or profane language against members of AUC administration, staff and faculty, students, or against any other members of the community.

Non-Academic Probation, Suspension, and Dismissal Criteria

Any student who exhibits personal characteristics or behavior that is inappropriate for one seeking to become a physician shall be subject to probation, suspension or dismissal regardless of academic performance. AUC may summarily remove a student from his or her course or clinical rotation and all future courses or clinical rotations, until a disposition is rendered through the formal Administrative Review Process if in the sole discretion of AUC, his or her conduct could be detrimental, or otherwise poses a risk to, the student, his or her peers or instructors, or the

delivery of patient care. This may involve a process of either non-academic probation or non-academic suspension depending on the severity of the accusation against the student and/or the observed behavior of the student. For the avoidance of doubt, AUC reserves the right to dismiss a student for either academic or non-academic reasons. Students should note that this information encompasses acts of dishonesty or other failure to comply with the Professional Conduct Policy.

Students should be aware that current criminal background checks are required on an ongoing basis during the term of their enrollment. If a student's criminal background changes after s/he submits to the background check associated with admissions to AUC, but before the student's official graduation from AUC, the student is required to bring the change to AUC's attention.

A student's criminal background may impact the student's standing in a number of ways. For example, a student's criminal conviction may result in dismissal. Pending charges may prevent a student from completing the clinical portion of the curriculum. A student may be required to take personal leaves or withdraw from enrollment until pending criminal charges are resolved. If the school conducts its own disciplinary proceedings based on student misconduct underlying or related to the student's criminal background, the student may be suspended or dismissed regardless of whether or not a criminal conviction is rendered.

A false or misleading statement made by a student on any document submitted to AUC is grounds for dismissal. For the avoidance of doubt: verbal threats, intimidation, stalking or harassment may be grounds for dismissal even if such conduct does not result in bodily harm.

The appropriate Dean renders non-academic dismissals. The procedure for appealing a non-academic dismissal is dependent on a student's academic standing at the time of dismissal, and is detailed within the AUC [Administrative Review and Grievance Procedures](#).

Any student that is the subject of disciplinary proceedings while enrolled at AUC may be subject to an additional background check and drug screening conducted by the school. Submitting a false or misleading statement on any document, including background information, to AUC will constitute grounds for dismissal. AUC reserves the right to conduct random drug tests at any time on any enrolled student.

STUDENT COMPLAINT PROCESS

INSTITUTIONAL COMPLAINTS

Students are encouraged to address complaints that they may have concerning AUC through a personal meeting with AUC personnel directly involved with the issue that is the subject of the complaint.

In the event the student is unable to resolve their complaint in this manner, the student may submit a written complaint.

- Sint Maarten campus: Assistant Dean for Student Affairs
- UK Track: Associate Dean for Academic Affairs, UKT
- Clinical Sciences: Senior Associate Dean for Student Affairs if the complaint is during clinical rotations.

The relevant dean will respond to written complaints within ten business days.

In the event a student has a complaint that has not been resolved by the University through use of the Administrative Review or Grievance Process, he/she may contact the state in which s/he resides. A complete list of state agencies may be found on the AUC website through the Contact Information for Student Complaint Process: [contact-information-for-student-complaint-processes.pdf \(aucmed.edu\)](#)

If a student complaint is associated with the institution's compliance with academic program quality and accrediting standards, he/she may file a complaint with the Accreditation Commission on Colleges of Medicine, the agency that accredits AUC's

academic program. The ACCM will only consider complaints that have not been resolved satisfactorily at the institutional level. The contact information for ACCM is:

ACCM Secretariat
6-9 Trinity Street,
Dublin D02 EY47, Ireland
Tel: +353 87 238 8502
Email: office@accredmed.org
Website: www.accredmed.org

Missouri Students Only

If a Missouri resident's complaint has not been remediated by AUC, then the student may log a complaint against the school to the Missouri Department of Higher Education. The contact information is as follows:

Missouri Department of Higher Education
301 W. High Street
P.O. Box 1469
Jefferson City, MO 65102-1469
Email: info@dhe.mo.gov

AUC STUDENT CONDUCT COMPLAINT AND APPEAL POLICY

Definitions

“Administrative Review Committee” is the committee of AUC administration, faculty, or staff members who may be chosen to evaluate Complaints and render a final determination, including, when applicable, disciplinary action. This committee is also referred to as the “ARC.” One member of each ARC committee is designated as the “Chair.”

“Advisor” is a single individual selected by the student (Respondent, Complainant, or Witness) who agrees to provide support to the student during the ARC or Appeal process. The advisor may be an attorney. The advisor may not speak on behalf of the student or answer any questions on behalf of the student during the hearing. The advisor is the only individual who may accompany the student to any ARC or Appeal Committee meetings.

“Appeal” is the process by which a written request is submitted by a party to an Administrative Review for reconsideration of the final determination made by the ARC.

“Complaint,” for purposes of this policy, shall mean a written statement submitted by a member of the AUC community alleging misconduct by an AUC student that purportedly violates the AUC Student Handbook, AUC Professional Conduct Policy, or other published rule or regulation.

“Complainant” shall mean a person filing a Complaint under this policy and includes alleged violations of [AUC's Non-Discrimination Policy](#). This policy does not include alleged violations of the Sexual Misconduct Policy or [AUC's Title IX Policy](#), which are managed through their separate policy.

“Complaint Coordinator” is the designated AUC administrator who receives written complaints. This is typically, the Assistant or the Associate Dean for Student Affairs. Contact information for the Title IX Coordinator and other information related to AUC's Sexual Misconduct and Title IX policy may be found [here](#).

“Discrimination” is conduct or behavior that is defined in the University's Non-Discrimination Policy. Refer to the University's Non-Discrimination Policy for additional information.

“Fact Witness” is an individual who has personal knowledge of either the specific incident(s) underlying the Complaint or the persons involved in the incident(s). Fact Witnesses are distinguished from “Expert Witnesses” in that an expert witness may have special expertise or proficiency in a particular field but lacks personal knowledge of the case related to the Complaint. Only Fact Witnesses are permitted in this process.

“Harassment” is conduct or behavior that is defined in the University’s [Non-Discrimination Policy](#). Refer to the University’s Non-Discrimination Policy for additional information.

“Honor Code” shall refer to the AUC Student Honor Code.

“Misconduct” is defined as any violation of the Student Honor Code, Non-Discrimination Policy, Professional Conduct Policy, or other published rule or regulation.

“Respondent” shall mean an AUC student who is the subject of a Conduct Complaint.

“Semester Day” shall mean any day on which classes are held or tests are administered at AUC’s St. Maarten campus.

“Title IX” - Title IX of the Education Amendments of 1972 prohibits sex and gender-based discrimination. Examples of the types of discrimination that are covered under Title IX include sexual harassment inclusive of sexual violence, stalking and interpersonal relationship violence; gender-based harassment; and discrimination based on pregnancy. AUC manages these complaints using our Title IX policy which can be found [here](#).

Policy Statement

The American University of the Caribbean School of Medicine (“AUC”) has established an Honor Code and Professional Conduct Policy. These are found in the Student Handbook and are intended to set a professional standard of conduct for all medical students.

AUC’s Honor Code and Professional Conduct Policy were developed jointly by faculty, students, and administration. As future physicians, all students are expected to meet the standards set out in and comply with the Honor Code, Professional Conduct Policy, and all other published policies that can be found in AUC’s Student Handbook. Any violation of the Honor Code, Professional Conduct Policy, and/or other published policies is defined as misconduct. Repeated minor violations of expected conduct of physicians-in-training may also rise to the level of misconduct. These include matters pertaining to professionalism such as, but not limited to, timeliness, communication style, attention to detail, professional engagement, and professional conduct.

The Complaint process as well as the Appeal process are provided to allow for alleged misconduct by students to be investigated and resolved by the University. Because no policy is one-size-fits-all, though, AUC reserves the right to deviate from this policy if the circumstances of a particular complaint or investigation call for additional flexibility.

Complaints

Student Judiciary Committee

Students submitting a complaint against another student may elect to submit the Complaint to the Student Judiciary Committee (SJC) rather than the Complaint Coordinator. The SJC is comprised of medical and clinical sciences students who may be permitted to review some types of Complaints made by students against other students. Each party to this process may present evidence and witness testimony for consideration by the SJC. Student may submit complaints to the SJC via this [link](#).

The SJC must notify the Complaint Coordinator of all complaints received. If approved by the Complaint Coordinator, the SJC may review Complaints between students that occur either on or off campus. Complaints that the SCJ are not permitted to review are: (1) Complaints that arise under the AUC Non-Discrimination policy; (2) Complaints that allege any violations of the Title IX and/or Sexual Misconduct

Policy; (3) Complaints concerning acts of academic misconduct; or (4) any Complaint brought forth by a faculty member or administrator.

The SJC may facilitate mediation on covered matters and issue non-binding resolutions that have been mutually agreed upon by the Parties. All Parties to the Complaint must agree in order for the resolution to be implemented. The SJC may not impose disciplinary actions.

The Complaint Coordinator or the SJC may determine at any point in the process of mediating a Complaint that the Complaint should be referred for Administrative Review.

Complaint Coordinator

Students, faculty, or staff wishing to file a Complaint against a student may do so by submitting a written Complaint directly to the Complaint Coordinator which is the [Assistant Dean for Student Affairs](#) (SXM Campus), the [Associate Dean for Student Affairs](#) (Clinical Sciences), or via this [link](#). In cases where one or both Student Affairs Deans are directly involved in the concerns, the Complainant may contact the [Chief Academic Officer](#). At a clinical site, the Complaint may be filed directly with the Associate Dean of Student Affairs; alternatively, the Clerkship Director or Site Director may be the intake point for the Complaint, and in turn, that Director will forward the complaint to the Associate Dean for Student Affairs. Complaints regarding sexual misconduct, including sexual harassment, domestic violence, dating violence, sexual assault, stalking and rape or acquaintance rape, are managed by a separate policy and may be reported directly to AUC's [Title IX Coordinator](#).

AUC will respect the privacy of parties to the fullest extent possible. Information will be reviewed and investigated to provide for a prompt evaluation of the incident. All Complaints will be reviewed by the Complaint Coordinator to determine the course of action need to ensure a professional and optimal learning environment.

- **Submitting Anonymously:** Your contact information will not be collected. The information in the Complaint will be collected for reporting purposes per federal reporting purposes but no further action will be taken unless details in the complaint can be substantiated by the Complaint Coordinator. For Complainants wishing to report anonymously, name, email, and other contact information is not required; however, please keep in mind that requesting complete anonymity will limit the institution's ability to investigate the concern, and the ability to inform the Complainant about any outcome or follow-up investigation.

The Complaint should be submitted as soon as possible after the conduct occurred, but no later than 30 Calendar Days from the day the basis of the Complaint arose or that the conduct leading to the Complaint was discovered by the Complainant. AUC may investigate any claim and will investigate certain claims, such as allegations of sex or gender-based misconduct and targeted harassment or discrimination, and may take appropriate action even if the allegations were not made in writing or if they were submitted anonymously. This action may include, if necessary, filing a Complaint on behalf of the individual who would be considered the Complainant in the case.

If a student is hesitant or unwilling to report a Complaint alleging discrimination, harassment (including sexual misconduct) or other unlawful conduct in writing, the student is encouraged to discuss their concerns with the Complaint Coordinator. Similarly, if a student feels that changes to academic or other situations are appropriate or necessary to preserve their safety or well-being as a result of the circumstances involved in a Complaint, they are encouraged to request assistance from the Complaint Coordinator.

Upon receipt of the Complaint, the Complaint Coordinator will provide the Complainant with a written notice acknowledging its receipt and will review the Complaint. The Complaint Coordinator will determine if the allegations made indicate a potential violation of any provision of the AUC Student Handbook or other AUC policy and/or whether the allegation may be indicative of a repeated pattern of unprofessionalism. In cases indicating a possible pattern of allegations or behavior set out in combined Complaints, the Complaint Coordinator may elect to file their own Complaint regarding the potential

pattern and initiate an Administrative Review.

Investigation

Once a Complaint is received, the Respondent will be informed by the Complaint Coordinator of the allegations against them and given the opportunity to deny or admit the charges. If the Respondent admits to the charges, the Complaint Coordinator or designee will issue the appropriate sanction(s). Admitting to the charges does not preclude a student from appealing the sanction(s). Generally, Respondents who admit to the charges will not have a hearing before an Administrative Review Committee unless deemed necessary by the Complaint Coordinator. If the Respondent denies the charges, the Complaint Coordinator or their designee will initiate an investigation. The extent and components of the investigation will vary depending on the allegations and circumstances.

For purposes of illustration, an investigation may include the following steps, as appropriate:

- Reviewing the written complaint
- Gathering additional information or statements from the Complainant as needed
- Gathering information from any witnesses or other people (e.g., faculty, staff or other students) with potentially relevant information
- Reviewing relevant documentation and policies
- Obtaining a response or written statement and other information from the Respondent
- Attempting a resolution of the complaint between the Complainant and Respondent, if appropriate
- Convening an Administrative Review Committee as appropriate.
- Assessing the information gathered and determining findings and resolution for the student

Complaints under investigation may be withdrawn by the Complainant subject to the confidentiality provisions noted below and with the understanding that, depending on the nature of the allegations, AUC may be obligated to investigate the complaint with or without the Complainant's involvement. For the St. Maarten campus, if a Complainant has been subjected to, or fears actual or threatened bodily harm, or the Complaint submitted indicates an imminent or substantive security risk to the Complainant, the AUC campus or community, the Complaint Coordinator shall immediately notify AUC CARE Team, the Campus Incident Commander and the Office of Safety and Security.

Administrative Review Process

Notification of Initiation of Administrative Review

The Parties to an Administrative Review (AR) will receive a letter from the Complaint Coordinator notifying them of the initiation of the AR process. At their sole discretion, the Administrative Review Committee (ARC) may choose to hold a hearing (virtual or in-person) with each of the Parties to the Complaint, however a hearing not a required part of the Administrative Review process. After all appropriate action has been taken to investigate the allegations made, as determined by the ARC, a Final Determination regarding the Complaint and Sanctioning will be rendered. The ARC shall use the standard of "more likely than not" when rendering a final determination on a Complaint.

Complainants and Respondents have a right to:

- Bring a single individual (advisor or support person) of their choice and at their own expense to the hearing. The advisor may be an attorney. The advisor or support person may not speak on behalf of the student or answer any questions on behalf of the student during the hearing. The name of the advisor/support person and their relationship to the student must be provided to the Complaint Coordinator or designee at least one business day prior to the hearing. At the discretion of the Complaint Coordinator or designee, the hearing may proceed without the advisor if the attendance of the advisor delays the hearing. The Complaint Coordinator reserves the right to remove an Advisor from any proceedings, including a hearing, if they are disruptive to the process.
- Be notified of the names of the ARC members in advance of the hearing.
- If a conflict of interest is present, a request for a replacement ARC member can be made prior to the hearing.

- Submit questions for the ARC to ask any party who will be interviewed as part of the hearing. The Complaint Coordinator or designee has the authority to determine whether the questions are relevant and appropriate. The parties involved are not permitted to question one another directly.
- Present information and fact witnesses to the ARC. The Complainant is permitted to present information and fact witnesses regardless of their level of participation in the resolution. The Complaint Coordinator or designee should be made aware of any fact witnesses by the Complainant when initiating the Complaint. The Respondent must identify any fact witnesses within three (3) business days of receipt of notice of initiation of an Administrative Review. Only fact witnesses who have relevant personal knowledge of events pertinent to the case will be interviewed or allowed to provide written statement for the committee's consideration.
- Review any written information prior to the hearing which will be presented to the ARC. The Complaint Coordinator or designee may redact information as required by state or federal law or to protect confidential or private information of the complainant, respondent and/or witnesses.
- Have the right to privacy in that only individuals who must know the facts of the case to assist in the resolution will be made aware of information pertaining to the case. Information may be shared with other parties, such as law enforcement as required by local, state or federal laws. Respondents have the following responsibilities:
 - Represent themselves in a truthful, professional and ethical manner when responding to allegations. Providing false or misleading information may result in a violation of the professional conduct policy.
 - Respond in a timely manner to request for information, including but not limited to:
 - Accepting or denying charges
 - Presenting witnesses
 - Providing a statement or additional information to the ARC
 - To not engage in retaliatory behavior. Engaging in such behavior is a violation of the professional conduct policy.

Timeline for Complaint Resolution

AUC considers a timely response for conducting an Administrative Review and rendering a Final Determination to be six (6) weeks from receipt of a Complaint, unless the ARC requires additional time to investigate the claim, wishes to take into account the outcome of third-party proceedings, or has other good reason to extend the review process. In the event of a delay in the process, the parties will be notified.

Interim Suspension

In certain circumstances, the University may impose an interim suspension prior to the hearing or administrative review to a) ensure the safety and well-being of members of the AUC community or preservation of AUC's property or b) if the University deems that the Respondent poses a threat of disruption of or interference with the normal operation of the University. During the interim suspension, the respondent may be denied access to AUC premises (including online and on-site classes) and/or all other AUC activities or privileges for which the respondent might otherwise be eligible, as the University may determine to be appropriate. In appropriate cases, the Complaint Coordinator may notify the Complainant of a Respondent's interim suspension status.

Sanctioning

Sanctions imposed by the ARC may be a combination of disciplinary, educational, and or restorative. The examples below are meant to be a general overview of types of sanctions that may be applicable, but this list is not exhaustive.

Disciplinary Actions

The ARC may impose one or more of the following disciplinary actions as part of the final determination for a Complaint:

- Written Warning – a written censure regarding the misconduct, which indicates that

further violations could result in disciplinary action.

- Financial Restitution – an amount required to be paid by the responsible Party in order to make another Party whole as a result of physical damage, theft or similar circumstance.
- Non-Academic Probation - Probation for a designated amount of time and may require completion of specific requirements determined on a case-by-case basis. For example, the ARC may impose, as a condition of probation, any of the following: counseling, medical and/or psychological evaluation, substance abuse treatment and/or testing, or additional healthcare services. This is not intended to be an exhaustive list. Probation may also include the loss of student privileges, use of AUC facilities, and attendance at AUC functions. During Non-Academic Probation, the student may be permitted to engage in some or all educational activities. Prior to return to full status, the student may be required to complete a formal, independent fitness-for-duty evaluation.
- Suspension – A set period of time, lasting up to one year, during which the privilege of participating in educational or other activities such as attending classes and/or being on campus or clinical sites is withdrawn. While suspended, a student may be required to comply with certain requirements, including, but not limited to counseling, medical and/or psychological evaluation, substance abuse treatment and/or testing, or additional healthcare services. This is not intended to be an exhaustive list. Suspended students may not be eligible for refunds of tuition/fees.
- Dismissal – Withdrawal of the privilege of attending AUC. A student who has been dismissed from AUC for disciplinary reasons is not eligible for readmission.
- Loss of Privileges – Denial of specific privileges for a designated amount of time. Examples include removal from extra-curricular activities and/or clubs and organization, including SGA and Honor and Service Society.
- Fines – Monetary penalties may be imposed.
- Restitution – Compensation for loss, damage, or injury. This may take the form of appropriate service and/or monetary or material replacement.
- Revocation of degree – Revocation of a previously conferred degree. Students whose degree award conferrals are revoked remain responsible for fulfilling financial obligations to AUC; federal, state, and local governments; and to private loan providers.
- Rescinding admission – Rescinding admission to the University is generally a permanent decision.

Educational and Restorative Actions

- Completion of an Educational Program - Attendance and completion of a class or workshop that will assist the student gaining insight and avoiding future non-compliance with the Professional Conduct Policy. Educational program attendance may be virtual.
- Service - Performance of a task, or tasks, designed to benefit the community and that also assists the student in gaining insight and avoiding future non-compliance with the Professional Conduct Policy.

Notification of Findings

Once the ARC has reached a Final Determination, the Complaint Coordinator will notify, in writing, the Complainant and Respondent of the results of the Administrative Review. The Complaint Coordinator may inform the Complainant if any sanctions have been taken but is not required to disclose the specifics of the action taken. Notification of the final determination shall be sent to the Parties in any way the Complaint Coordinator deems appropriate, including but not limited to, email and regular mail. Deviations from prescribed procedures shall not necessarily invalidate a decision, unless significant prejudice to a Respondent, Complainant, or AUC result.

Failure to Comply with Disciplinary Action or Specific Sanctions

In the event a student disregards or fails to comply with any disciplinary actions or remediation, in whole or in part, imposed as the result of the outcome of the ARC process, the AUC Administration may act upon those violations without convening another ARC. The AUC Administration in this situation may, at its sole discretion, determine whether additional disciplinary action is warranted as a result of such a violation, up to and including dismissal from AUC. The result of such additional action will also

become a part of the Respondent student's file.

Disciplinary Proceedings and Permanent Educational Records

The reporting requirements for the Educational Commission for Foreign Medical Graduates (ECFMG) and the Medical Student Performance Evaluation (MSPE) vary depending on the type of conduct reported and the disciplinary action taken. For additional information on ECFMG or MSPE reporting requirements, please contact the Office of Professional Development at OSPD@aucmed.edu.

Appeal Procedures

An Appeal to an ARC decision must be made within five (5) semester days of the date the ARC Final Determination was provided to the Parties. Appeals must be submitted in writing to the University Dean and must explicitly state the reason for the appeal. The Complainant or Respondent may appeal the final determination. The only acceptable bases for filing an Appeal are:

1. There is new evidence that was unavailable at the time of the original investigation that would affect the outcome of the original decision.
2. There were procedural irregularities in the complaint process that affected the outcome.
3. The Final Determination from the Administrative Review was not reasonable based on the evidence compiled during the investigation.

Within ten (10) semester days the Dean will render a determination as to whether the Appeal meets one of the three stated bases for Appeal. If it does, the Dean may convene an Appeal Committee to consider the merits of the appeal and render a decision on the appeal within thirty (30) semester days from the date the student was notified that an Appeal Committee has been convened. In their absence, the Dean may designate another person to fulfill these responsibilities.

The Appeal Committee may accept, amend (by reducing, increasing, adding or removing disciplinary measures in whole or in part) and/or reject all or part of the final determination rendered by the ARC. The decision rendered on any Appeal is final and may not be further appealed.

Confidentiality

AUC wishes to create an environment in which individuals feel free to discuss concerns. AUC understands that students, witnesses, and others involved in the investigation process may be concerned about the confidentiality of information they are sharing. In some cases, however, AUC may be obligated to take action when it becomes aware of information relating to a complaint.

Confidentiality will be maintained to the extent possible and consistent with AUC's obligations in investigating complaints.

Once an individual discloses identifying information to AUC through the processes described above, they will be considered to have filed a complaint with AUC. While the confidentiality of information received, the privacy of individuals involved and compliance with the wishes of the student or witnesses cannot be guaranteed, they will be respected to the extent possible and appropriate.

Retaliation

AUC prohibits retaliation against anyone who reports an incident of alleged harassment, discrimination or other unlawful conduct, or any person who assists or participates in a proceeding, investigation or hearing relating to such allegations. Retaliation includes, but is not limited to, any form of intimidation, reprisal or harassment. All complaints of retaliation should be reported in accordance with the complaint procedures outlined above.

Submission of a good-faith complaint or report of harassment, discrimination or other unlawful conduct will not adversely affect the student's future grades, learning or academic environment. AUC will discipline or take appropriate action against anyone who retaliates against any person who reports an incident of alleged harassment, discrimination, or other unlawful conduct, or who retaliates against any person who testifies, assists or participates in a proceeding, investigation or hearing related to such allegations.

STUDENT RIGHTS UNDER FERPA
(The Family Educational Rights and Privacy Act)

AUC respects the rights and privacy of its students and acknowledge the responsibility to maintain confidentiality of personally identifiable information.

FERPA is a federal law that affords students the following rights with respect to their education records. These rights include:

1. THE RIGHT TO INSPECT AND REVIEW THE STUDENT'S EDUCATION RECORDS
Students have the right to review their education records within 45 days of the day the institution receives their request. Students should submit to the registrar, dean, or head of the academic department a written request that identifies the record(s) they wish to inspect. The institution official will make arrangements for access and notify the student of the time and place where the records may be inspected. If the official to whom the request is submitted does not maintain the records, that official will advise the student of the correct official to whom the request should be addressed.
2. THE RIGHT TO SEEK AN AMENDMENT OF INACCURATE OR MISLEADING INFORMATION
Students may ask the institution to amend a record that they believe is inaccurate or misleading. They should write to the official responsible for the record, clearly identify the part of the record they believe should be changed and specify why it is inaccurate or misleading. If the institution decides not to amend the record as requested by the student, the student will be notified of the decision and advised of his or her right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when they are notified of the right to a hearing. Following the hearing, if the institution still decides not to amend the record, the student has a right to place a clarifying statement in the record.
3. THE RIGHT TO LIMIT DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION
Students have the right to consent to disclosure of personally identifiable information contained in their educational records, except to the extent that FERPA authorizes disclosure without consent.

One exception that permits disclosure without consent is disclosure to a school official who has a legitimate educational interest. A school official is a person employed by the institution in an administrative, supervisory, academic, research, or support staff position (including campus security, incident commanders and health staff) or a student serving on an official committee, such as a disciplinary or grievance committee. A school official also may include an Adtalem Global Education colleague, a volunteer, or contractor outside of the institution who performs an institutional service or function for which the institution would otherwise use its own employees and who is under the direct control of the institution with respect to the use and maintenance of PII from education records, such as an attorney, auditor, intern or collection agent or a student volunteering to assist another school official in performing their tasks. School officials have a legitimate educational interest if the official needs to review an education record in order to fulfill their professional responsibilities for the institution.

Another exception that permits disclosure without consent is disclosure of directory information. Directory information is not considered to be harmful or an invasion of privacy if disclosed. See the Directory Information section for additional information.

4. THE RIGHT TO FILE A COMPLAINT WITH THE U.S. DEPARTMENT OF EDUCATION IF THE INSTITUTION FAILS TO COMPLY WITH FERPA REQUIREMENTS

Complaints should be directed to:

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-4605
Phone: 1-800-USA-LEARN (1-800-872-5327)

DIRECTORY INFORMATION

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

- **Directory Information:** Name, address, telephone number, email address, date and place of birth, dates of attendance, previous institution(s) attended, major field of study (program), enrollment status, degrees and awards, past and present participation in officially recognized activities, residency obtained.

To Withhold Information

To have directory information withheld, students must submit a written request to the Registrar. Once filed, this request becomes a permanent part of the student’s record and no information may be released until the student instructs the institution otherwise.

UNAUTHORIZED DISTRIBUTION OF COPYRIGHTED MATERIALS

AUC strives to provide access to varied materials, services and equipment for students, faculty and staff and does not knowingly condone policies or practices that constitute an infringement of Federal copyright law. Transmitting or downloading any material that you do not have the right to make available and that infringes any patent, trademark, trade secret, copyright or other proprietary rights of any party is prohibited.

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

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

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

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

Alternatives to Illegal Downloading

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

FREE AND LEGAL

Clipart:

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

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

Fonts:

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

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

Photos:

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

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

Music:

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

COLLEAUGE CODE OF CONDUCT



ADT▲**LEM**
GLOBAL EDUCATION

Code of Conduct and Ethics

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Dear Colleagues,

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

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

The way we conduct ourselves is essential to our continued success in an industry that is heavily regulated and scrutinized. Even more important, it is critical to maintaining our reputation among students as the place where they can bring their educational and career dreams to life, among colleagues as a great place to work and among our communities as an organization that is committed to Doing Well By Doing Good. Complying with international, federal, state and local regulations is only the beginning. We should – and do – go beyond what is legally required. All of us, regardless of our level or role, are responsible for acting with the utmost personal and professional integrity every day.

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

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

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

Stephen W. Beard
President and CEO

Applying Our Values

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

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

Who Needs to Follow Our Code

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

The actions of customers, vendors, agents, and other third parties who work with us can have an impact on our reputation. For this reason, we strive to work only with third parties that share our commitment to ethics and compliance, and we expect them to act in a way that is consistent with our Code. We will take the appropriate measures where we believe they have not met our high standards.



TO LEARN MORE
Adtalem Global Education’s Vendor
Code of Conduct

How to Use This Code

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

The application of each section of this Code may vary from institution to institution. When an institution’s policy or local law is stricter than the standards in this Code, follow your institution’s

policy or local law. When in doubt, contact Integrity and Compliance for guidance or submit a question to the Speak Up Help Site or Help Line.

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

Our Expectations

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

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

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

Managers’ Additional Responsibilities

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

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- Leading by example. Be a resource for others. Talk to your colleagues and business partners about how the Code and our policies apply to their daily work and listen to their concerns and questions.
- Working proactively and on an ongoing basis to ensure your colleagues are trained and well-versed in the rules that apply to their roles.
- Creating an environment where everyone feels comfortable asking questions and reporting potential violations. • Encouraging your colleagues to complete training.
- If you oversee third parties working with Adtalem or any of its institutions or companies, ensuring that they understand our Code, the Vendor Code of Conduct and their responsibilities.
- Asking Integrity and Compliance for help when faced with ethical or compliance matters that you are unsure how to handle.
- Creating a work environment free of discrimination, bullying and harassment.

Q&A

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

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

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

You are responsible primarily for the people who report to you, but all colleagues of Adtalem and its institutions and companies have a responsibility to report suspected misconduct that occurs even if outside of their reporting lines and, where appropriate, intervene to deter or stop any colleague

misconduct. In many cases, the best approach is to talk first with the manager who oversees the area where the problem is occurring. However, if you are concerned about this being the best approach, you should talk to your manager, an HR representative, Adtalem Legal or Integrity and Compliance; you can also report the misconduct using the Speak Up Help Site.

Accountability Under the Code

Violating relevant laws, regulations, the Code or our policies, or encouraging others to do so, may harm our reputation and expose you to disciplinary action up to, and including, immediate termination of employment. Certain actions may also lead to legal proceedings against you, your fellow colleagues and/or Adtalem.

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

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

Speak Up: Ask Questions and Report Concerns

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

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

- Contact your manager. Be as specific and detailed as possible, so that they understand your question or concerns.
- Contact Integrity and Compliance.

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- Contact a member of the Adtalem Legal team, your local Human Resources representative or askHR.
- Go to the Speak Up Help Site or Help Line to ask a question or submit a report. You have the option to remain anonymous when you ask a question or report a known or suspected violation online or by phone.

Retaliation is Prohibited

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

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

What to Expect When You Use Our Speak Up Resources

The Speak Up resources, the Help Site and Help Line noted below, are a confidential way to obtain answers to your questions and concerns and to report possible misconduct. The Help Site and Help Line are operated by an independent company, is available 24 hours a day, seven days a week, and is multilingual.

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

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

All reports will be kept confidential to the extent practical, except where disclosure is required for

Adtalem to investigate a report or by applicable law or legal process.

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

SPEAK UP RESOURCES Helpline

U.S.: 1.800.461.9330

North America SMS: 773.904.1074

St. Kitts: 1.720.514.4400

Barbados: 1.855.203.6928

St. Maarten: 1.720.514.4400

Help Site www.speakupadtalem.com

In order for the Speak Up resources to work effectively, reports and inquiries must be made in good faith. For this purpose, good faith simply means an honest belief that a report is true and accurate, even if the facts reported prove to be false.

Colleagues found to have made bad-faith reports are subject to disciplinary action, up to and including immediate termination of employment. A bad-faith report means a report by a colleague that intentionally makes false claims of misconduct by a colleague, student or third party.

Making the Right Choice

You may find yourself in a situation in which you are uncertain about what to do. It may help to ask yourself:

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

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Closing the Loop

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

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

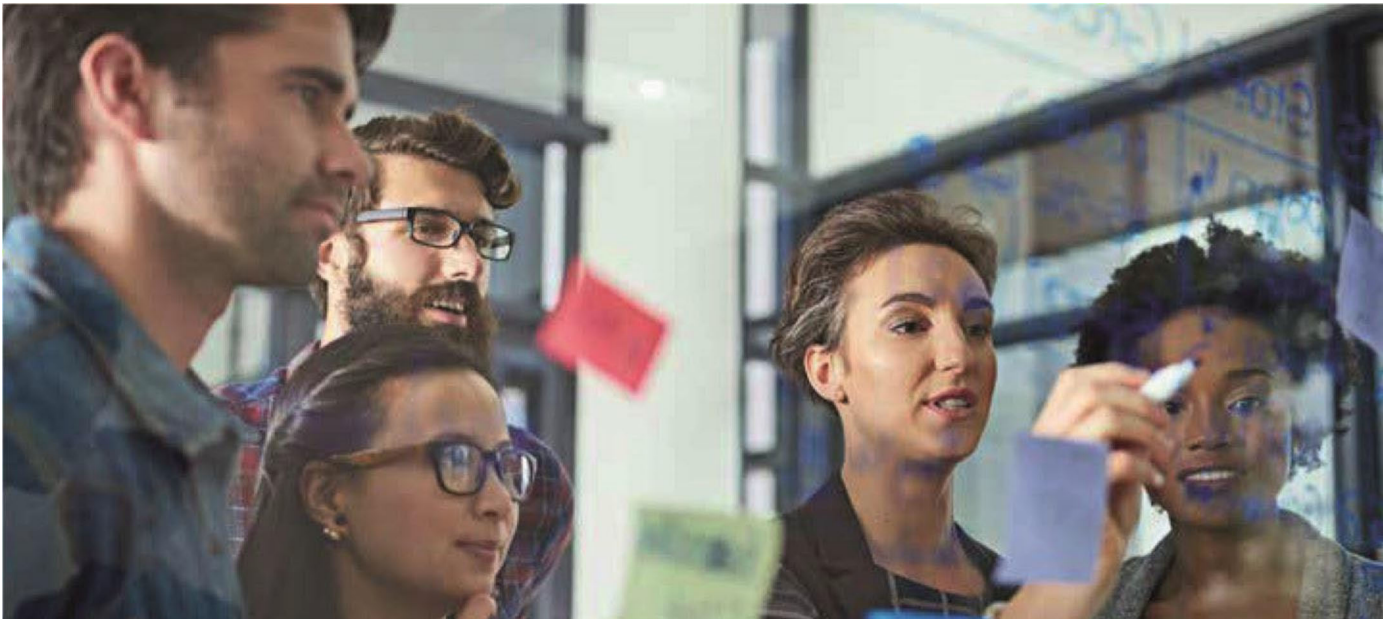
If your answer is "no" and you believe more should be done, contact Integrity and Compliance. Your suggestions will help us improve our Integrity and Compliance program.

and dignity and base all employment decisions on merit, experience and personal aptitude.

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

Always Keep in Mind

- Treat everyone with respect.
- Encourage and listen to those who speak up, and work to create a culture



Our Responsibilities to Our Community

Through respect, collaboration and communication, we have built a dynamic team of talented colleagues. We work together with one purpose: To empower our students to achieve their educational and career goals. Maintaining our team-based culture not only helps our students succeed, it also creates the setting for each of us to thrive personally while making a positive contribution to one another's success.

Value Equal Opportunity

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

where others feel valued and understood.

- If you manage people or are involved in recruitment and hiring, judge others based on performance, qualifications, abilities and potential.
- Avoid introducing unrelated considerations into your decisions. Use objective, quantifiable standards to the extent possible.
- Do not engage in favoritism for any reason.
- Respect colleagues' privacy, dignity and life outside of work.

Q&A

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

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

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

Avoid Harassment, Bullying and Intimidation

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

Always Keep in Mind

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

Sex and Gender Misconduct, and Bullying

Adtalem is committed to maintaining an educational environment that is free from sex and/or gender misconduct. Sex and gender misconduct includes sexual harassment, sexual assault, rape, domestic violence, dating violence, stalking, sexual

exploitation, and gender-based harassment. When a student has been a victim of sex and/or gender misconduct – even if the act did not occur on Adtalem property – it can impede his or her ability to fully participate in the educational benefits that we provide. Therefore, it is important that we all do our part to prevent all forms of sex and gender-based misconduct and support our student and colleague survivors.

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

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

Watch Out for These Red Flags

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

Q&A

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

This type of conduct is not acceptable, regardless of whether it takes place in Adtalem's offices. Adtalem

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supports a work environment free from harassment, so don't wait for it to happen again to address it. If you feel safe and comfortable doing so, be firm and tell your colleague such actions are inappropriate and must be stopped. We take these matters very seriously and encourage you to report the problem to your manager, your local HR representative or askHR, or use the Speak Up Help Site or Help Line.

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

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

Appropriate Relationships

Adtalem is committed to fostering workplace and academic environments that enhance our students' educational goals, our professional experiences and the reputation of our educational institutions. For this reason, we expect colleagues to uphold the following standards for maintaining appropriate relationships in the workplace.

Colleague-to-colleague relationships

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

Colleague-to-student relationships

Under no circumstances are faculty members, administrative personnel or other colleagues permitted to engage in any romantic or intimate

relationships with prospective or current students if they do at the time, or may in the future be able to, influence or control enrollment, counseling, supervisory, or grading activities or decisions affecting that student. You are encouraged to report improper relationships between students and colleagues to askHR, your local HR representative, Integrity and Compliance or via the Speak Up Help Line or Help Site.

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

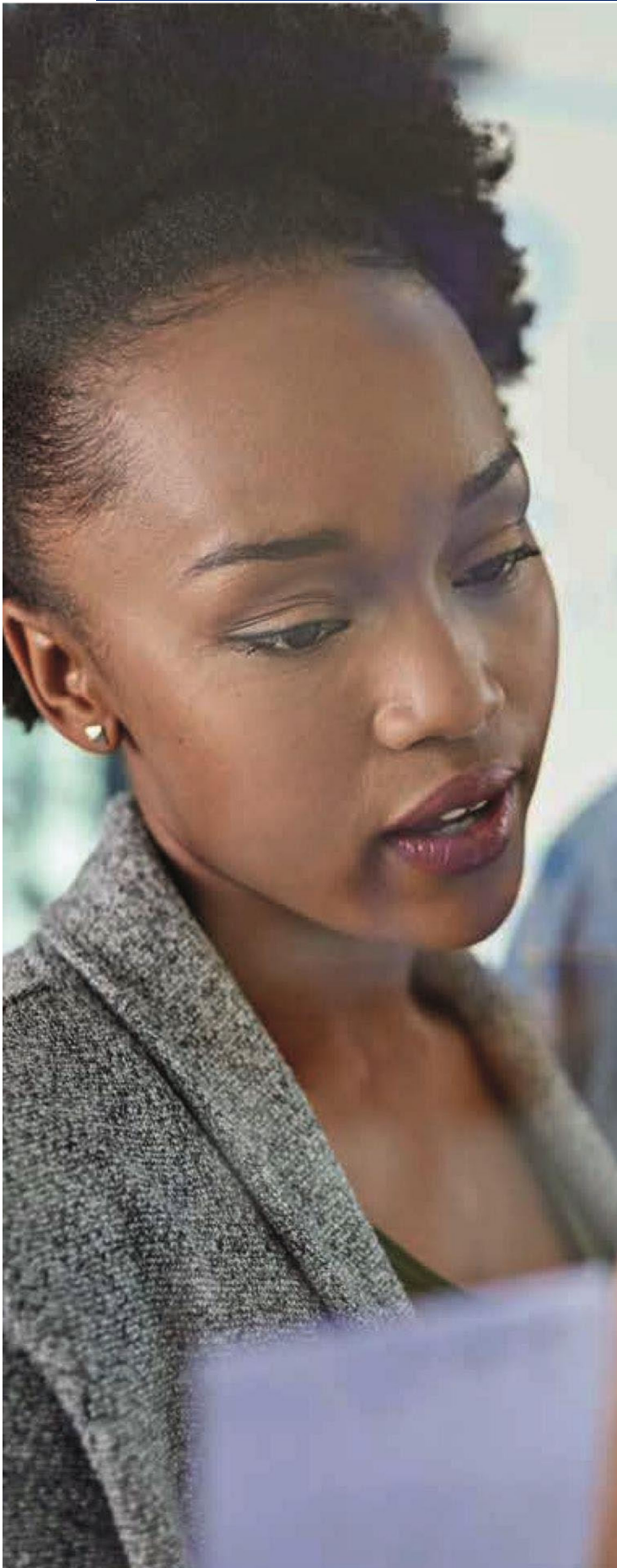
Where that is the case, the stricter standards prevail. For more information, or if you have questions, contact the head of academic affairs for your institution, askHR or your local HR representative, or use the Speak Up Help Line or Help Site.

Keep One Another Safe and Secure

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

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

Adtalem provides each location with a set of standard requirements and procedures designed to keep colleagues safe. We also provide a framework for each location to follow when responding to incidents. In addition, each campus has a designated Incident Commander who serves as the primary point of contact with regard to safety and security matters. For more information, or to raise a concern or report an incident, contact your local Incident Commander, your local campus leader, your local security department, or Adtalem's Security Office.



Always Keep in Mind

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



TO LEARN MORE

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

Drug and Alcohol Use

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

Accommodations

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

Alcohol and Drug-Related Support

If you have a drug- or alcohol-related problem, we encourage you to seek assistance. If you are outside of the United States, please see your local HR representative. Alternatively, you can download and access the Ginger Emotional Support app: In the app, tap "Get Started," and enter your work email address.

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Follow the instructions sent to your inbox. From there, Ginger will work with you and recommend the level of support that is recommended. Additionally, if you are enrolled in an Adtalem medical plan, you can seek treatment directly on your own.

Q&A

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

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

Respect Privacy and Protect Personal Information

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

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

Always Keep in Mind

- Be accountable for protecting PII and stay informed about our PII-related policies.
- Only share personal information, including PII, with those who have a legitimate need to know and whose access is appropriately authorized.
- Never disclose a student's government-issued identification number; credit or debit card numbers or passwords.
- Never disclose academic records or student information to outside parties without the student's consent, unless required by law or as permitted in limited circumstances under our applicable policies.

- Be transparent about our privacy practices and how individuals can contact us with questions or concerns.
- Promptly report any actual or suspected unauthorized uses, disclosures or access to PII to your manager or to Integrity and Compliance.
- Never prohibit a student from reviewing his or her own academic records.
- Always ensure that third parties working with Adtalem are required to and do comply with our privacy policy requirements.
- Where you believe we are transferring or will transfer personal information from one country to another, contact Integrity and Compliance to be sure you understand applicable policies, laws and regulations.



TO LEARN MORE

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

Q&A

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

You should immediately retrieve the document from the copier and deliver it to the document owner. If you don't know who the document owner is, contact your manager, your local HR representative or Integrity and Compliance for guidance. Protecting confidentiality and privacy is the responsibility of every colleague. When papers containing confidential information are left on the copier, the person who left them there is neglecting his or her duty to protect the confidentiality of others. Similarly, you should never leave laptops or other electronic portable devices unattended, especially if they contain sensitive information. It takes only a few seconds for someone to do serious damage to your computer or your files or to access information on the computer, so take the time to lock your computer when you leave your desk.

Use Our Assets Wisely

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

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

Proper Use of Information Technology

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

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

Always Keep in Mind

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



TO LEARN MORE

Adtalem Global Education’s Colleague Handbook, “Use Our Tools Responsibly” section

Maintain the Highest Standards of Academic Integrity

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

Always Keep in Mind

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



TO LEARN MORE

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

Marketing, Advertisement, Recruitment and Admissions

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

We provide truthful, accurate and non-misleading information to prospective students, and we base admission solely on each applicant’s ability to meet admission requirements, which vary by institution.



We honor and properly document requests of students or other consumers not to be contacted by us via email, phone or other methods.

When recruiting prospective students, we provide responsible, objective and unbiased information. We are always truthful and never misleading, following the tenets of Adtalem's Responsible Communications policy and training. We hold ourselves to these high standards not just because it is the law, but because it is the right thing to do to help our students achieve their educational and career goals.

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

Always Keep in Mind

Our Responsibilities to Our Partners and the Public

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

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

Serve the Greater Good

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

As global citizens, we are committed to:

- Supporting social and educational initiatives in the communities in which we live and work
- Participating in relief efforts and service projects around the world
- Complying with the relevant environmental laws and regulations applicable in each country in which we operate • Considering environmental responsibility as a factor our

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decisions including recycling, conserving resources and working with our business partners

- Managing and minimizing our impact on the environment
- Comply with all applicable legal requirements and Adtalem policies and approval procedures when developing or implementing public relations, marketing, and advertising materials.
- Be sure all materials are truthful, complete, accurate, properly substantiated and not misleading.
- Provide supporting data and qualifying language when using statistics.
- Clearly state that the education offered is not a guarantee of employment or “success. “unethically, it can expose us to legal repercussions and/or damage our reputation.

can expose us to legal repercussions and/or damage our reputation.

Always Keep in Mind

- Make supplier-related decisions in the best interest of Adtalem and not for any personal benefit or gain.
- Be responsive to all reasonable requests from our business partners, but never do something that you regard as unlawful or contrary to laws, regulations, the Code or our policies. • Respect the confidential information and intellectual property of others.
- Choose vendors and other third parties carefully, and never work with prohibited countries, organizations or persons.



Build Lasting Business Relationships

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

Our business partners-including our suppliers, vendors, representatives and agents-represent us in the marketplace. If they act illegally or unethically, it

- Watch for and report any signs that our business partners are violating applicable law or regulations.
- Be sure to follow Adtalem policies and procedures before you sign any contract with a third party for Adtalem or your institution.

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TO LEARN MORE

Adtalem Global Education's Supply Management Policy

Adtalem Global Education's Vendor Code of Conduct

Adtalem Global Education's Colleague Handbook, "Authorization Required for Contracts and Agreements" section

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

Safeguard Confidential Information

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

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

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

Always Keep in Mind

- Use and disclose confidential information only for legitimate business purposes.
- Properly label confidential information to indicate how it should be handled, distributed and destroyed.
- Protect intellectual property and confidential information by sharing it only with authorized parties.
- Never discuss confidential information when others might be able to overhear what is being said – for example, on airplanes, in elevators or in other public places – and be careful not to send confidential information to unattended fax machines or printers.
- Follow all policies, procedures and retention schedules related to records and information management. Secure laptops, portable devices and storage media that may contain confidential or proprietary information, and follow all network and information-security policies and protocols.

Intellectual Property

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

Other examples of our intellectual property include:

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

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



TO LEARN MORE

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

Avoid Insider Trading

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

"Material, non-public information" generally refers to any information that is not available to the public and that a reasonable investor would consider important when deciding whether to buy, sell or hold a share. This can include news about acquisitions, financial results, important management changes, commencement or termination of major contracts as well as news about the financial, operational or environmental performance of an organization. It is important to know that material, non-public information can also be confidential information

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about another organization that you have obtained during the course of your work.

Always Keep in Mind

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



TO LEARN MORE

Adtalem Global Education's Insider Trading Policy

Keep Accurate Books and Records

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

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

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

regulatory data and other essential organizational information.

Always Keep in Mind

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

Q&A

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

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

Compete Fairly

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

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

Violations of antitrust laws can carry severe fines and penalties.

Always Keep in Mind

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

Watch Out for these Red Flags

Colleagues must not:

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

laws, rules or regulations in all relevant jurisdictions.

Q&A

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

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

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

Trade association meetings and other industry gatherings typically serve perfectly legitimate and worthwhile purposes. However, these meetings also provide a potential pitfall under competition and antitrust laws because they bring together competitors who may be prone to discussing matters of mutual concern. You must be especially careful to avoid discussions or exchanges of information relating to competitive matters. If competitors are discussing these matters, you should excuse yourself.

Gathering Business Intelligence

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

When gathering information on a competitor, you must never:

- Seek out confidential information of a competitor or someone outside the organization.
- Purchase confidential information related to a competitor.
- Use confidential information obtained inadvertently or accidentally.



- Request to see confidential bids submitted by competitors.
- Invest in a competitor to gain access to confidential information.

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

Avoid and Disclose Conflicts of Interest

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

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

Always Keep in Mind

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

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

Business Opportunities

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

Personal Relationships

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

Outside Employment

We do not prohibit colleagues from engaging in all outside employment. However, certain activity may

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involve a conflict of interest and should be disclosed and approved by Integrity and Compliance.

Some examples include:

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

Personal Investments

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

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

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

Civic Activities

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

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

Exchange Only Appropriate Gifts and Entertainment

When handled properly, appropriate and reasonable gifts and entertainment can strengthen business relationships. But when abused, they can damage our

reputation, harm our business and may even be illegal.

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

Always Keep in Mind

- Only provide and accept gifts and entertainment that are reasonable complements to business relationships.
- Do not solicit personal gifts, favors, entertainment or services.
- With the exception of nominal expressions of gratitude such as a thank-you card or flowers, colleagues should never accept a gift from a current or prospective student.
- Faculty and students may wish to assemble to celebrate the end of a semester or other academic achievement. Such events are permitted, provided that:
 - The event adheres to the institution’s Values.– Students do not purchase food, beverages or alcohol for faculty members.
 - The event conforms to the expectations set forth in the “Appropriate Relationships” and “Safety and Security” sections of this Code.
- Personal gifts or entertainment exchanged between colleagues are not subject to the Gifts and Entertainment policy. However, these items should never be charged as a business expense or otherwise purchased with Adtalem resources.

Types of Gifts and Entertainment That are Never Allowed

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

- Gifts or entertainment that are lavish or frequent.
- Gifts or entertainment from a source of student lending



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

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

Gifts and Entertainment of Government Representatives

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

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



TO LEARN MORE

If you ever have questions about whether or not a gift or entertainment is acceptable, discuss the matter with your manager or contact Integrity and

Compliance. Adtalem's Gifts & Entertainment Policy; Adtalem's Anti-Bribery and Anti-Corruption

Policy

Engage in Responsible Public Communications

Adtalem is a publicly held organization and a member of the New York Stock Exchange. Therefore, it is common for Adtalem to receive inquiries from the investment community, government agencies and the media on a variety of

CODE OF CONDUCT AND ETHICS

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

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

Always Keep in Mind

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

Social Media

- There are a limited number of colleagues who are authorized to respond or otherwise speak on behalf of Adtalem, and those who do so should use only Adtalem-managed social media outlets for that purpose.
- If you read an online comment about Adtalem that you believe is wrong, do not respond. Adtalem's Global Communications and Corporate Affairs department regularly monitors external content and will respond appropriately.
- Be thoughtful in all your communications online, including through social media. Never harass or post discriminatory comments (as defined by our anti-harassment/ anti-discrimination policies), or threaten fellow colleagues, students or anyone else. Harassing, threatening or

similarly inappropriate conduct that violates Adtalem's policies is discouraged in general and is never allowed while using Adtalem equipment or during your working time.

Personally managed social media outlets or websites may not be used to advertise, promote, recruit for or support the business of Adtalem in any way.



TO LEARN MORE

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

Our Responsibilities as an International Organization

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

Avoid Corruption and Bribery

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

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

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

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

Bribery is a crime in the countries where Adtalem and our institutions operate, and penalties can be

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severe. If you have questions or concerns, discuss them with your Adtalem Legal representative or Integrity and Compliance.

Always Keep in Mind

- Do not offer or accept bribes or any other kind of improper payment, including facilitation payments.
- Keep accurate books and records so that payments are correctly described and Adtalem funds are not used for unlawful purposes.
- Know who you are doing business with and confirm that appropriate due diligence has been conducted on third parties.
- Never do anything through a third party that you are not allowed to do yourself.



TO LEARN MORE

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

Q&A

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

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

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

You should decline and inform the person that your organization's policies prohibit you from making such payments. Remember: No matter where you are,

our policies apply. You should never provide a payment or anything of value to gain an improper business advantage.

Engage With Care in Political Involvement

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

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

Always Keep in Mind

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

CODE OF CONDUCT AND ETHICS

- See also the “Gifts and Entertainment of Government Representatives” section of this Code.
- Do not use Adtalem resources or facilities to support your personal political activities.
- Be alert to efforts to receive, transfer, transport, retain, use, divert or hide the proceeds of any criminal activity.

Watch Out For These Red Flags

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



TO LEARN MORE

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

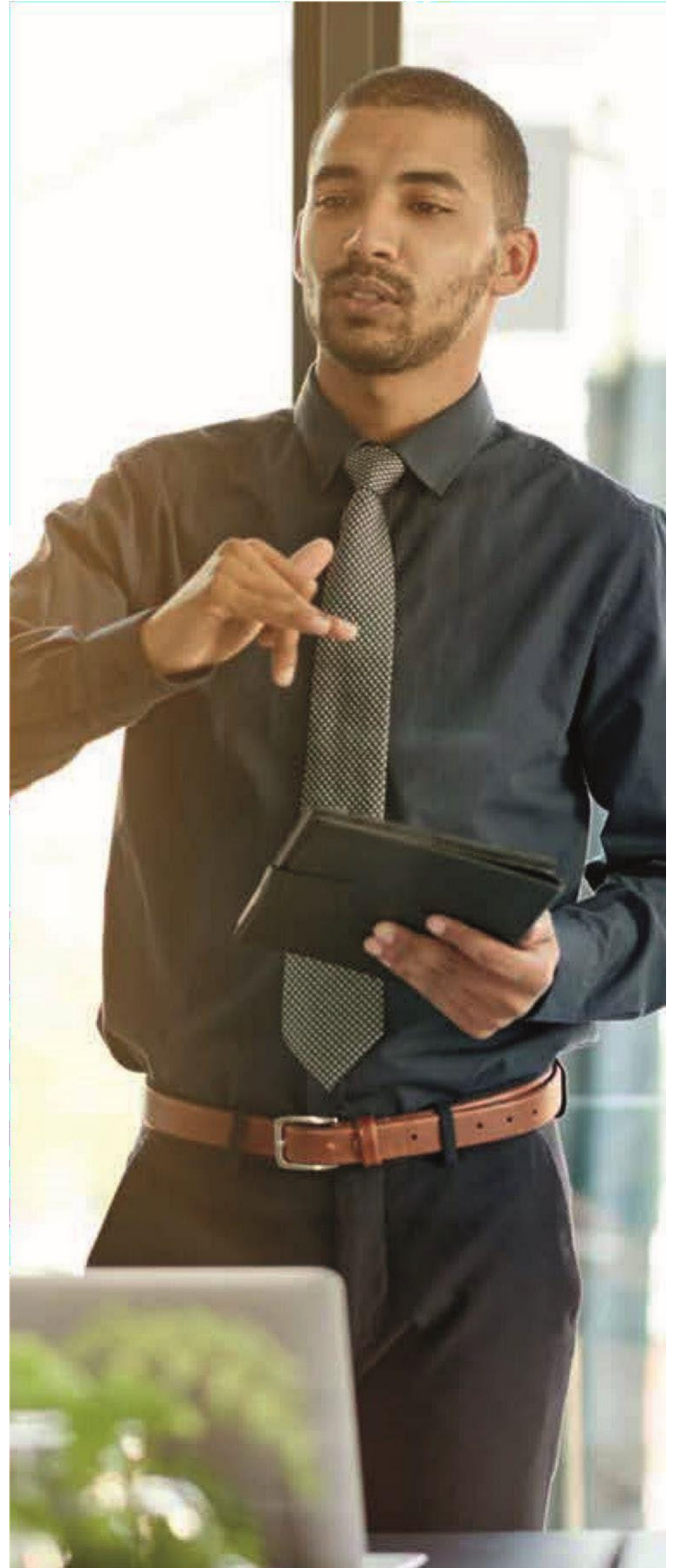
Operate Globally with Integrity

We must always operate with transparency and comply with all laws governing global trade. The laws governing trade across international borders, including imports and exports and the transfer of technology, are extensive and complicated. The sanctions for violating these laws can be severe, up to and including substantial fines and/or imprisonment.

Always Keep in Mind

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

- Follow all applicable trade laws and regulations in the countries where we operate.
- Consult with the Integrity & Compliance Team in Legal or another member of the legal team before transferring goods, equipment, data or technology of any kind across borders or to individuals from other countries, even if they are in the U.S.
- Never engage in any financial transactions that promote or result from criminal activity.



- Report any suspicions that such criminal conduct has occurred to Integrity and Compliance or your Adtalem Legal representative.

Q&A

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

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

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

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

Retaliation

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

ADT^LEM
GLOBAL EDUCATION

Weapons: carrying, possession, etc.	0	0	0	0	0	0	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0	0	0	0	0	0	0
	<u>On Campus</u>						<u>Non-Campus Property</u>			<u>Public Property</u>		
<u>Referral for Disciplinary Actions</u>	2022		2023		2024		2022	2023	2024	2022	2023	2024
	Cam pus	Dorm	Cam pus	Dor m	Cam pus	Dor m						
Weapons: carrying, possession, etc.	0	0	0	0	0	0	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0	0	0	0	0	0	0
<u>Hate Crimes</u>												
Prejudice Categories:												
Race, Religion												
Sexual Orientation												
Gender, Gender Identity												
Disability												
Ethnicity												
National Origin												
On campus or public property:	2022	2023	2024									
<u>Total Unfounded Crimes</u>	0	0	0									

