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1. Policy Context

1.1. Purpose

- To provide a productive workplace free of discrimination, harassment, and retaliation.
- To provide equal opportunity for all employees.
- To comply with applicable laws against discrimination, harassment, and retaliation.

1.2. Scope

This Policy applies to every officer, director, full- and part-time employee, faculty member, contractor, and student worker of Laureate. References in this Policy to “Laureate” means Laureate Education, Inc., and each of its direct and indirect subsidiaries, including, for avoidance of doubt, higher education institutions operated by any subsidiary of Laureate Education, Inc.

Harassment is not limited to the physical workplace itself. It can occur while employees are traveling for business or at employer sponsored events or parties. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

Third parties interacting with Laureate employees are expected to comply with the same standards established under this Policy.

1.3. Definitions

- **Disability:** A physical or mental impairment that substantially limits one or more major life activities, or having a history or record of such an impairment, or being perceived by others as having such an impairment.
- **Discrimination:** Making employment-related decisions, other than accommodation decisions, based on race, color, religion, gender, age, marital status, sexual orientation, national origin, citizenship status, disability, veteran status, gender identity, generic information (including family medical history), or any other status protected by the laws in the locations where we operate.
- **Harassment:** A form of discrimination that includes unwelcome verbal conduct (such as insulting comments, slurs, or other statements which are based on a legally protected classification, or harassing phone calls), writings and communications made electronically (such as e-mails and text messages), visual conduct (such as derogatory posters, cartoons, drawings, leering or gestures), physical (such as hitting, pushing, touching or other unwanted physical conduct, or threat to take such action) or other conduct of any kind that is based on a legally protected characteristic and has the intent or effect of creating an intimidating, offensive, or hostile work environment.

Unacceptable behavior may include:

- Offensive language, jokes or slurs,
 - Degrading comments,
 - Other visual, verbal or physical conduct that could create an intimidating, hostile or offensive work environment,
 - Making unwelcome sexual advances,
 - Making requests for sexual favors,
 - Making submission to other verbal or physical conduct of a sexual nature as a condition of an employee's continued employment,
 - Making submission to or rejection of such conduct the basis for employment decisions affecting the employee; or
 - Creating an intimidating, threatening, hostile, or offensive working environment by such conduct.
- **Retaliation:** Reprisals or retribution against an employee for raising a concern about discrimination in good faith or harassment, or for participating in a discrimination or harassment investigation, or exercises any right under state or federal employment laws is a violation of this Policy.
 - **Sexual Harassment:** Verbal, visual, or physical conduct of a sexual nature that is unwelcome or that makes someone feel uncomfortable, and creates an intimidating, offensive, or hostile work environment. It can take many forms, including sexual advances; requests for sexual favors or unwelcome demands for dates; sexually oriented jokes, pictures, texts, or email messages; explicit or degrading comments about appearance; and display of sexually suggestive pictures or pornography.

2. Policy Statement

2.1. Roles and Responsibilities

- **Employees:**
 - Contact Human Resources immediately if they feel they (or others) have experienced discrimination, harassment, or retaliation. You may also contact your supervisor, Ethics & Compliance, or use the Laureate Ethics Helpline at <https://laureateethics.ethicspoint.com>.
 - Cooperate fully with Human Resources in investigations of possible discrimination, harassment, or retaliation.
 - Conduct themselves as above in a manner that does not violate this Policy.
 - Maintain confidentiality in relation to investigations of possible discrimination, harassment, or retaliation.

Discrimination and Harassment Policy

- **Supervisors:**
 - Maintain an environment free of discrimination, harassment, and retaliation.
 - Contact Human Resources immediately if an employee reports discrimination, harassment, or retaliation, or if there is reason to believe that an employee has been subjected to discrimination, harassment, or retaliation.
 - Work in conjunction with Human Resources during investigations of possible discrimination, harassment, or retaliation.
 - Conduct themselves in a manner that does not violate this Policy.
 - Initiate corrective action in coordination with HR if discrimination, harassment, or retaliation has occurred.
 - Maintain confidentiality in relation to investigations of possible discrimination, harassment, or retaliation.
- **Human Resources:**
 - Offer management tools to help maintain a work environment free from discrimination, harassment, and retaliation, and consult on equal employment opportunity issues.
 - Consult with Legal prior to any investigation of possible discrimination, harassment, or retaliation to ensure the proper resources are engaged and procedures followed.
 - Work in conjunction with managers and Legal to investigate complaints of discrimination, harassment, or retaliation, maintaining confidentiality.
 - Be available to give advice on handling situations where inappropriate behavior is apparent or suspected.
 - Ensure that this Policy is applied consistently.
 - Legal:
 - Provide advice and consultation on harassment, discrimination, and retaliation issues.
 - Answer any questions from HR prior to investigations of possible discrimination, harassment, or retaliation, on applicable legal requirements
 - Participate in or direct investigations where appropriate.
- **Legal:**
 - Provide advice and consultation on harassment, discrimination, and retaliation issues.
 - Answer any questions from HR prior to investigations of possible discrimination, harassment, or retaliation, on applicable legal requirements
 - Participate in or direct investigations where appropriate.

2.2. Policy Requirements

- **Equal Employment Opportunity**

Laureate is committed to providing equal employment opportunities (EEO) for all people, regardless of race, color, religion, gender, age, marital status, sexual orientation, national origin, citizenship status, disability, veteran status, gender identity or any other status protected by the laws or regulations in the locations where we operate. Making employment decisions based on any of these personal characteristics is a violation of this Policy and is illegal under the laws of many countries.

This Policy extends to all terms and conditions of employment, including, but not limited to, hiring, placement, promotion, termination, layoff, recall, transfers, leave of absence, compensation and training. We comply with applicable laws governing nondiscrimination in every location in which we operate.

- **Discrimination or Harassment**

Laureate has a zero-tolerance policy for discrimination or harassment based on an individual's race, color, religion, gender, age, marital status, sexual orientation, national origin, citizenship status, disability, veteran status, gender identity or any other status protected by the laws or regulations in the locations where we operate.

We expect everyone at Laureate to treat each other with respect. Laureate employees, candidates for employment, clients, vendors, suppliers, and visitors to our campuses and locations should expect an environment free from harassment and discrimination. Any harassment or discrimination, whether from a Laureate employee or other, should be reported in accordance with this Policy.

Because the intent of this Policy is to deter harassment and discriminatory conduct that is unwanted, unreasonable, and demeaning, Laureate may consider conduct to be in violation of this Policy even if it falls short of unlawful discrimination or harassment under applicable law.

- **Reasonable Accommodation for Disabilities**

Laureate makes every effort to reasonably accommodate individuals with a disability, including, a disability caused or contributed to by pregnancy, in order to provide employment opportunities for them. Furthermore, Laureate is committed not to discriminate in any manner against qualified individuals with disabilities with regard to all terms and conditions of employment. Employees who believe they have a disability that may require a reasonable accommodation in order to perform the essential functions of their position should contact their manager or the Human Resources department.

- **Dating and Personal Relationships**

In general, Laureate employees may date and develop friendships and relationships inside the workplace as long as the relationships do not negatively affect work.

The exception relates to managers and supervisors. Employees in managerial or supervisory roles must understand that personal relationships with employees who report (either directly or indirectly) to them may be perceived as favoritism, misuse of authority, or potentially, sexual harassment. Therefore, employees in a managerial or supervisory position should not enter into a romantic or intimate relationship with a subordinate. If such a relationship does arise, both the manager and subordinate must report the relationship to HR, which will work with the parties to consider options for resolving any conflict of interest created by the relationship. This applies if the subordinate employee is a direct subordinate, if the supervisor may have influence over salary or promotional opportunities of the subordinate, or if any other potential conflict of interest could be perceived.

- **Reporting**

Any Laureate employee who believes they have been harassed or discriminated against, or is aware of a situation where another employee is being harassed or discriminated against, should report the situation to the Human Resources Department, their supervisor, Ethics & Compliance, or through the Laureate Ethics Helpline (<https://laureateethics.ethicspoint.com>) immediately. Supervisors must report any harassment or discrimination of which they are aware. All supervisors who receive a complaint or information about harassment, or observe what may be harassing behavior are required to report such suspected harassment to HR. Supervisors will be subject to discipline for failing to report suspected harassment or otherwise knowingly allowing harassment to continue. Supervisors will also be subject to discipline for engaging in any retaliation.

All reports of harassment or discrimination will be promptly and appropriately investigated in as confidential a manner as possible. Laureate will take immediate and appropriate action if harassment or discrimination is determined to have occurred.

While the process may vary from case to case, investigations should be done in accordance with Laureate's Investigations Manual, published on the LaureatePolicy Library.

- **Retaliation**

Any retaliation against a person who raises a concern about harassment or discrimination in good faith, or participates in a relevant investigation, is a violation of this Policy. Retaliation can take many forms, including intimidation, denial of a promotion, a poor performance review, or termination of employment. All of this behavior is prohibited if it is in response to someone for having raised a concern honestly or participated in an investigation

Employees who believe someone has been retaliated against or that they themselves have been retaliated against, should report the matter to HR.

- **Relation to Applicable Laws**

If there is any conflict between this Policy and any law applicable to Laureate operations, we must follow the applicable law.

2.3. Deviations

There are no deviations currently approved for this Policy.

2.4. Related Policies

For additional information regarding Laureate's Recruiting and Selection practices as they relate to Equal Employment Opportunities, please refer to the Talent Attraction Policy

3. Policy Governance

3.1. Ownership

It is the responsibility of the Chief Human Resources Officer to monitor and enforce compliance with this Policy.

3.2. Non-Compliance Warning

Employees who violate this Policy will be subject to disciplinary action, up to and including termination of employment.

3.3. Review

This Policy should be reviewed by the Policy Council every two years for clarity, accuracy, and relevance.