



Anti-Harassment & Non-Discrimination Policy

I. Purpose

DeVry University “DeVry” is committed to providing a work environment that is healthy and productive in which everyone is treated with dignity and respect. This policy prohibits harassment, discrimination, bullying and retaliation. Through this policy, we seek to foster a work environment where people do not treat each other differently based on those characteristics that make us unique.

II. Scope

This policy applies to all DeVry Colleagues, officers, directors, vendors, students, visitors, and agents of DeVry University. This policy prohibits colleagues, third parties, supervisors and managers from engaging in discriminatory, harassing bullying or retaliatory conduct. Further, this policy covers harassment, discrimination, bullying and retaliation that occurs while in the workplace and in work-related settings acting on behalf of DeVry, such as during DeVry hosted or sponsored events, business travel, and off-site meetings.

III. Definitions

- A. Bullying.** Offensive, intimidating, malicious or insulting behavior involving the misuse of power that makes a person feel vulnerable, upset, humiliated, undermined or threatened. "Power" does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation. Bullying can take the form of physical, verbal and non-verbal conduct.
- B. Discrimination.** The act of treating someone less favorably because of his/her race, religious creed (including religious dress and grooming practices), color, ancestry, national origin (including language use restrictions), sexual orientation, gender, gender identity, gender expression, marital status, sex (which includes pregnancy, childbirth, breastfeeding and medical conditions related to pregnancy, childbirth or breastfeeding), age (over 40), physical or mental disability including HIV and AIDS, denial of family and medical care leave, medical condition, genetic information, military and veteran’s status, uniformed service, or citizenship status.
- C. Harassment.** A form of employment discrimination that involves verbal or physical conduct toward another person that is unwanted or offensive, and that has the purpose or effect of violating a person's dignity or creating an intimidating, humiliating, hostile or offensive work environment.
- D. Retaliation.** The act of mistreating or penalizing a colleague for having engaged in a protected activity, like filing a report of harassment or discrimination, or helping with an investigation.
- E. Sexual Harassment.** A form of employment discrimination/harassment involving unwelcome sexual advances, requests for sexual favors, and other verbal, physical or visual conduct of a sexual nature that is so frequent or severe that it creates a hostile or offensive work environment or results in adverse employment decisions.



IV. Policy Statement

DeVry University prohibits harassment (including sexual harassment), discrimination, bullying and retaliation by a colleague, supervisor, officer, director, vendor, student, applicant, visitor or agent of DeVry toward another person in one of the aforementioned groups. Engaging in this type of prohibited conduct will be treated as a disciplinary matter, and may result in termination.

Examples of prohibited conduct includes, but is not limited to:

- threatening, abusive or intimidating acts related to a person's race, ethnicity or other protected status;
- epithets or slurs;
- negative stereotyping;
- written or graphic material that degrades or shows hostility or aversion toward a certain person;
- offensive sexually-oriented verbal kidding;
- teasing or jokes;
- repeated unwanted sexual flirtations, advances or propositions;
- continued or repeated verbal abuse of a sexual nature;
- graphic or degrading comments about someone's appearance or sexual activity;
- offensive visual conduct including leering, making sexual gestures and displaying offensive sexually suggestive objects or pictures, cartoons or posters;
- unwelcome pressure for sexual activity, offensively suggestive or obscene letters, notes or invitations;
- offensive physical contact such as patting, grabbing, pinching or brushing against another's body;
- or sexual favoritism.

A. Complaint Procedures

Colleagues are expected to use DeVry's Open Door approach. The complaint should be filed first with the colleague's manager. If the colleague's manager is directly involved, the colleague should file the complaint with his or her manager's manager (the "one-up" manager), or the location leader. At any time, colleagues may also contact Human Resources, any other manager, or may file a complaint with DeVry's anonymous reporting system, www.devry.ethicspoint.com, accessed from the Internet or by calling 844-703-9374. Colleagues may also contact DeVry's Title IX Coordinator.

Complaints and allegations of misconduct will be kept confidential (to the extent possible); responded to in a timely manner; investigated by qualified personnel in a thorough, timely and impartial manner; documented and tracked; and colleagues will be timely notified upon the closure of the investigation. Appropriate remedial action will be taken, when necessary, based on the findings of the investigation into the complaint. DeVry will not tolerate retaliation against any colleague who lodges a complaint or participates in an investigation.

Colleague should see the Colleague Complaint Procedure for additional information.



B. Provide Equal Opportunities

DeVry is committed to having a workplace that is free from discrimination, harassment and retaliation and we therefore recruit, hire, develop, promote, discipline, and provide other conditions of employment based on ability, performance and experience. Hiring managers are not permitted to choose one prospective colleague over another based on a person's gender, race, color, age, sexual orientation, national origin, disability or other protected characteristic.

C. Duty of Managers

1. Managers are responsible for attempting to address any harassment, intimidation, discrimination or retaliation of which they are aware. Failure to do so may be treated as a disciplinary matter.
2. Managers and supervisors are to report any complaints of misconduct to their manager, Human Resources or DeVry's anonymous reporting system, www.devry.ethicspoint.com, accessed from the Internet or by calling 844-703-9374 so DeVry can try to resolve the claim internally.
3. No supervisor or manager shall threaten or insinuate, either explicitly or implicitly, that an individual's rejection or acceptance of sexual advances will be used as a basis for an employment decision affecting that applicant or colleague. Such conduct by the supervisor or manager will be treated as a serious disciplinary matter.