



EEO POLICY STATEMENT

Apollo Education Group, Inc. and its subsidiary companies ("Apollo Education Group") are firmly committed to the concept and practice of equal employment opportunity and to providing a workplace and learning environment that is free from unlawful discrimination. As such, it is Apollo Education Group's policy not to discriminate against any employee (Faculty or Staff) or applicant for employment on the basis of age, citizenship, color, creed, disability, ethnicity, familial or marital status, gender, gender identity, genetic information, national origin, pregnancy, race, religion, sexual orientation, veteran status, or any other status or characteristic protected by applicable federal, state, or local law. This policy applies to all terms, conditions, and privileges of employment including, but not limited to, recruiting, hiring, placement, training, educational assistance, transfer, promotion, leaves of absence, evaluation of performance, rate of pay or other forms of compensation and benefits, social and recreational programs, employee facilities, disciplinary action, and termination. An individual's employment, and future changes in work assignments, shall be based entirely on the individual's ability, education, training, relevant experience, performance, and other valid job requirements.

Apollo Education Group's commitment to equal employment opportunity includes making reasonable accommodation to the known physical or mental impairments of otherwise qualified individuals with disabilities unless such accommodation imposes an undue hardship on the conduct of Apollo Education Group's business.

In addition, harassment of any person based on any status or characteristic protected by applicable federal, state, or local law is a form of unlawful discrimination and is prohibited by this policy.

Apollo Education Group is equally committed to and greatly values the diversity of its Students, Staff, and Faculty and strives to maintain a united environment embodying principles of mutual respect and acceptance for everyone. Our goal is to create a climate of innovation, opportunity, and success which benefits from the cultural, professional, and personal diversity of the workforce and student body.

Apollo Education Group is further committed to the concept and practice of affirmative action. In compliance with federal government requirements and with the full support of Greg W. Cappelli, Apollo Education Group's CEO, Apollo Education Group maintains written Affirmative Action Programs which are designed to ensure equal employment opportunity. Apollo Education Group is committed to their success and to employing and advancing in employment qualified females, minorities, individuals with disabilities, and protected veterans at all levels of employment.

Responsibility for the implementation of this policy is assigned to Apollo Education Group's Senior Vice President and Chief Human Resources Officer, Frederick J. Newton. Further responsibility for administering and carrying out all phases of this policy is, in turn, assigned to Apollo Education Group's VP HR Shared Services, Nancy Jagger, who has the authority, the resources, and the support of and access to top management to ensure its effective implementation.

Any employee (Faculty or Staff) who believes that he or she has been treated in a way that violates this policy should contact either his or her manager *or* that manager's manager. In addition, any employee or applicant for employment with a concern relating to this policy may contact the Human Resources Department or utilize Apollo Education Group's Ethics Helpline which is available seven days a week on a 24-hour basis at 1-888-310-9569 or online at www.apollohelpline.com.



NOTICE OF POLICY AND PRACTICES APPLICABLE TO INDIVIDUALS WITH DISABILITIES and PROTECTED VETERANS

POLICY

As part of its business practices and policies, Apollo Education Group, Inc. and its subsidiary companies (Apollo Education) are firmly committed to the concept and practice of equal employment. As such, it is Apollo Education's policy not to discriminate against any Faculty or Staff or applicant for employment on the basis of disability, protected veteran status, or any other category or characteristic protected by applicable federal, state, or local law. This Policy applies to all terms, conditions, and privileges of employment. An individual's employment, and future changes in work assignments, shall be based entirely on the individual's ability, education, training, relevant experience, performance, and other valid job requirements. Apollo Education's commitment to equal employment opportunity includes making reasonable accommodation to the known physical or mental impairments of otherwise qualified individuals with disabilities, to the extent that such accommodation does not impose an undue hardship on the conduct of Apollo Education's business.

Apollo Education is also committed to the concept and practice of affirmative action. In furtherance of applicable federal requirements and with the full support of its CEO, Gregory W. Cappelli, Apollo Education maintains Affirmative Action Programs for Individuals with Disabilities and Protected Veterans. These Programs are designed to enhance the opportunities of qualified Individuals with Disabilities and Protected Veterans, and they contain an audit and reporting system.

DEFINITIONS

For purposes of the Affirmative Action Programs, the following definitions apply:

- *Individual with a Disability* refers to any person who (i) has a physical or mental impairment which substantially limits one or more of such person's major life activities; (ii) has a record of such an impairment; or (iii) is regarded as having such an impairment.
- *Protected Veterans* include: (i) *Disabled Veterans* (a veteran of the U.S. military, ground, naval or air service who is entitled to compensation or who but for the receipt of military retired pay would be entitled to compensation under laws administered by the Secretary of Veterans Affairs, or a person who was discharged or released from active duty because of a service-connected disability); (ii) *Recently Separated Veterans* (any veteran during the three-year period beginning on the date of such veteran's discharge or release from active duty in the U.S. military, ground, naval, or air service); (iii) *Armed Forces Service Medal Veterans* (any veteran who, while serving on active duty in the U.S. military, ground, naval or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985); and (iv) *Active Duty Wartime or Campaign Badge Veteran* (veterans who served on active duty in the U.S. military, ground, naval or air service during a war, or in a campaign or expedition for which a campaign badge has been authorized under the laws administered by the Department of Defense).

INVITATION TO SELF-IDENTIFY

If you are an Individual with a Disability or a Protected Veteran and wish to be considered under the Affirmative Action Programs, please complete an Invitation to Self-Identify form, which can be obtained from the Human Resources Service Center (contact information below).

REQUEST FOR REASONABLE ACCOMMODATION

If you wish to be considered for a reasonable job-related accommodation, please contact your Manager or Apollo Education's Human Resources Department. The request may be made orally or in writing. Applicants for employment who need an accommodation with respect to the application process may send a message to accessibilityforapplicants@apollo.edu.

NON-HARASSMENT

It is Apollo Education's policy that employees and applicants for employment shall not be subjected to harassment, intimidation, threats, coercion, or retaliation because of their status as an Individual with a Disability or a Protected Veteran or because they engaged in or may engage in any of the following: (i) Filing a complaint or assisting or participating in an activity related to the administration of any federal, state, or local law requiring equal opportunity for Individuals with Disabilities and Protected Veterans; or (ii) Opposing any act or practice made unlawful by, or exercising any right protected by, any federal, state, or local law requiring equal opportunity for Individuals with Disabilities and Protected Veterans. Any complaint or concern may be presented orally or in writing to the Responsible Company Officials identified below or, as the circumstances dictate, to Apollo Education's Human Resources Department or to Apollo Education's Legal Department.

RESPONSIBLE COMPANY OFFICIAL

Apollo Education has designated the following to have overall responsibility for this Policy and the implementation of its affirmative action activities: Frederick J. Newton, Senior Vice President and Chief Human Resources Officer, and Nancy Jagger, VP HR Shared Services.

PROGRAM REVIEW

The Affirmative Action Programs applicable to Individuals with Disabilities and to Protected Veterans are available for inspection upon request by contacting the Human Resources Service Center at HR.ServiceCenter@apollo.edu during regular business hours (AZ time), Monday through Friday.

Pay Transparency Policy Statement

Source: Employee Handbook

Policy Library

Title: Pay Transparency Policy Statement	Policy Number: EH-535
Policy Owner: Human Resources Shared Services	Supersedes: Employee Handbook V21
Effective Date: January 1, 2017	Version Number: Employee Handbook V22

1.0 Overview

2.0 Scope

All Employees

3.0 Policy

Apollo Education Group, Inc., including any of its subsidiaries, will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information (*41 CFR 60-1.35 (c)*).

4.0 Monitoring and Enforcement

5.0 Citations

6.0 Related Policies

7.0 Definitions

8.0 Handbook Revision History