

# OUR MISSION, VISION & COMPANY VALUES

## OUR MISSION:

“Education that builds careers and transforms the lives of those who learn, teach, and work here.”

## OUR VISION:

“Be highly regarded and broadly recognized as an education institution that provides an outstanding learning experience by cost-effectively delivering engaging and clearly differentiated educational programs that support students in developing their professional careers.”



## OUR VALUES:

### Teamwork

Working collaboratively on shared goals; and making “doing the right thing” the default setting for every decision and action.

### Innovation

Creating a culture that pursues new and better ways to improve performance and deliver an exceptional educational experience to our students.

### Leadership

Creating an environment where people are inspired to do great work and are empowered to make decisions.

### Integrity

Creating a platform of transparent and ethical actions that is at the heart of everything we do.

### Excellence

Delivering an outstanding experience to our students and the work we perform on behalf of the organization.

### Respect

Ensuring that every person we work with, both inside and outside the company, is valued and treated fairly.

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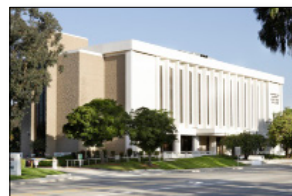
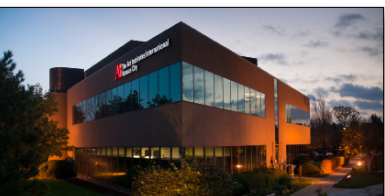
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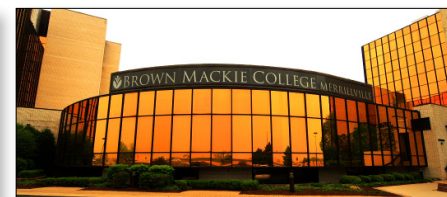
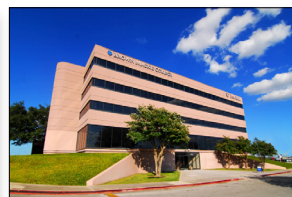
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# EDMCC Education Management Corporation

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# CONSENT JUDGMENT

As announced on November 16th, 2015, effective January 1st, 2016, we are operating under a Consent Judgment that reflects our agreement with Attorneys General of 39 states and the District of Columbia to resolve outstanding investigations. Regardless of your position, role, or department, you are responsible for complying with the letter and spirit of the Consent Judgment in the work you do every day. Every employee already has received an overview of the commitments in this Consent Judgment, and many of you will receive additional detailed training in the coming months on those provisions which specifically impact your job.

Here are some of the key provisions of the Consent Judgment:

- An Administrator has been designated to monitor and oversee our compliance for at least the next three years. During this time, he will be responsible for seeking out and advising us about problems within EDMC that would violate or potentially violate terms of the Consent Judgment. Cooperation with this Administrator, including any requests from him, is the responsibility of every employee and everyone must cooperate. No one will be retaliated against for cooperating with or assisting the Administrator in his duties.

- This agreement prohibits the use of Abusive Recruitment methods in our interactions with students. We must not manipulate, exploit, or pressure prospective or current students to enroll or stay enrolled in a program.

- All materials and communications must be truthful, accurate, and current, and we must ensure that the information be presented in a Clear and Conspicuous manner.

- We will increase the monitoring of calls by implementing technology that allows us to record all of our communications with Prospective Students, including conversations that begin with our lead vendors. These calls will continue to be analyzed using voice analytics software in an effort to identify potential problems, opportunities for additional training and any appropriate action.

- We will continue to use a Single-Page Disclosure with detailed information about each of our programs, including completion time, debt, and costs. This Disclosure must be shown to all prospective students twice and discussed at least once before the student signs an Enrollment Agreement.

- We will continue to review our Programmatic Disclosures to ensure that students understand whether a criminal record will or may disqualify them from employment in a field related to their program of study, and whether licensure, certification, or programmatic accreditation are required for employment. Programmatic Disclosures are also reviewed to ensure that they make clear whether programs qualify students to sit for licensure or certification examinations.

· We will continue to use the specific methodology dictated in the Consent Judgment in our calculations of job placement rates.

· We will continue to use the Electronic Financial Interactive Platform (“EFIP”) which was implemented in April 2017 and created previously in conjunction with the Consumer Financial Protection Bureau (“CFPB”), which is intended to be an interactive, personalized disclosure of financial realities of attending school. Every pProspective sStudent will generate an individualized report before signing an Enrollment Agreement.

· All incoming undergraduate students who have previously completed fewer than 24 college credits are required to complete an online and/or in-person orientation program at no cost. If they do not attend this orientation, they will not be allowed to attend class.

· All EDMC schools will offer a mandatory withdrawal period in which a student can stop attending class and receive a full refund, including tuition and fees paid. For ground programs, the student has 7 days from his/her first scheduled day of class to withdraw. For online programs, they have 21 days from the first scheduled day of the term. Blended programs will adhere to the terms of the Enrollment Agreement when determining the proper withdrawal period.

· Failure to comply with the Consent Judgment may result in disciplinary action, up to and including termination.

If you see or hear something that you believe is inconsistent with the Consent Judgment, speak up by contacting The Legal Department immediately at [edmclegal@edmc.edu](mailto:edmclegal@edmc.edu).

## CONTACT WITH THE ADMINISTRATOR

As part of the Consent Judgment with the State Attorneys General, an Administrator has been appointed to monitor and review the compliance of EDMC and its education systems. You may be approached directly by the Administrator or his or her delegate to provide certain information related to your job or position or to make certifications as to actions or processes. You must be honest, respectful, timely, and thorough in answering questions. You must never certify to anything that is false, misleading, disingenuous or deceptive. Failure to cooperate with an Administrator's request without good reason may lead to discipline, up to and including termination. If you receive a request from the Administrator, please contact the Legal Department directly for assistance. There is to be no retaliation against an employee for their good faith cooperation with the Administrator.

### OUR RESPONSIBILITIES

- Know and Understand the Code
- Know and understand the Consent Judgment
- Know and Understand Applicable Laws and Policies
- Apply the Code Every Day
- Act With Integrity and Transparency
- Report Concerns and Seek Guidance
- Offer Suggestions for Improving the Code and Policies and Procedures







# OUR EDUCATION SYSTEMS

## The Art Institutes System of Schools and Brown Mackie College System of Schools

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TEAMWORK · INNOVATION · LEADERSHIP · INTEGRITY · EXCELLENCE · RESPECT



In order for our students to thrive and achieve, we must maintain our commitment to delivering high quality academic programs and related services and support. We all play an important role in the success of our students. When we understand and uphold the standards of conduct that apply when engaging with current and prospective students, we create an environment that enhances teaching, learning, and professional development, to the benefit of all.

## ACADEMICS AND STUDENT SERVICES

We believe that excellence in education is measured by practical outcomes that enhance the lives of students who contribute positively to the workplace. To ensure continued excellence in education, each institution must implement ongoing institutional assessment and improvement activities and planning. The evaluation process should be based on program outcomes and viability including, but not limited to, such factors as student learning outcomes, student persistence, graduate employment and starting salary, student satisfaction surveys, and enrollments in the program. Such assessment shall occur annually to ensure continued excellence in our educational offerings.

## Professional Credentials

Excellence in education is achieved by the delivery of learner-centered instruction through faculty who exhibit excellence in teaching, possess appropriate academic credentials, and have industry-related experience.

To ensure the provision of quality education to our students, members of our faculty, both full and part-time, are required to hold and maintain certain credentials. Because of the nature and variety of the educational programs and courses at our education systems, the exact credentials that are required may be different across institutions. Occasionally, alternative qualifications such as industry-specific work experience may either substitute for, or be required in addition to, credentials or certifications. It is a violation of this Code to falsify or misrepresent any required credentials or related documentation.

Each education system shall develop policies and procedures to assure that the performance of all faculty is consistently evaluated and improving by monitoring communication skills, student evaluations, faculty observations, and any other qualitative or quantitative criteria required by the institution's accreditation, professional licensure and certification boards, and state licensing.





## ADMISSIONS AND RECRUITING

Each education system has developed an admissions policy that is consistent with its publicly stated mission and is responsible for administering the policy as written.

At a minimum, each applicant to one of our institutions must be a high school graduate or possess a recognized high school equivalency (GED) certificate in order to be considered for admission. If a specific program or field of study requires additional entrance requirements, such as prior course work or the completion of an associate's or bachelor's degree, such prerequisites shall be published by the institution.

We will not engage in abusive or deceptive recruiting practices. We will not omit any material fact, engage in unfair practices, or make representations inconsistent with required disclosures of the U.S. Department of Education.

We are committed to compliance with federal, state, and local laws and regulations, as well as the requirements of the Consent Judgment, which govern appropriate communications with prospective and current students.

We are committed to communicating accurate and current information in our admissions and recruitment activities.

We must not misrepresent any facts or data concerning our education systems. Any statement made to a current or potential student, whether in person, or through marketing or promotional material, or via electronic means including phone or e-mail must be accurate and not misleading. All employees must ensure that no express or implied false, deceptive, or misleading statements, claims, or guarantees are given about any educational institution, including but not limited to any of the following: program completion rates, transfer of credit, graduation, likelihood of obtaining employment, job placement rates, ability to obtain a license or certification, academic standing of programs or faculty, and actual or potential financial obligations.



**We are committed to communicating accurate and current information in our admissions and recruitment activities.**

## THE FOLLOWING INFORMATION MUST BE COMMUNICATED CLEARLY AND ACCURATELY AT ALL TIMES:

### Accreditation and Enrollment

- The nature and extent of an institution's accreditations, both institutional and programmatic, as well as whether or not the credential/degree sought by students has been authorized by an appropriate state licensing agency, or professional licensure and certification boards;
- Details regarding the training and experience of full and part-time faculty and personnel, including the number, availability, and qualifications;
- Requirements for successful program completion, including the nature and extent of any prerequisites which may be established for enrollment in any course or field of study;
- Institutional policies relating to the transfer of credit, including any criteria used to make credit transfer decisions, and appropriate disclosures regarding the transfer of credits from our institutions to other institutions; and
- Any other information concerning the program, including the nature, condition, and availability of the facilities, training devices or equipment, the character and availability of tutorial, specialized instruction, or advising/counseling, and the availability, frequency, or appropriateness of its programs and courses to stated employment objectives.

### Financial Information

- Graduation and student loan default rates of the institution, as reported to the U.S. Department of Education; and
- Complete and accurate information about the nature and extent of financial charges and obligations for attendance.

### Typical Student Outcomes

- The type and nature of employment assistance available to graduates;
- Information concerning employment rates, average starting salaries, and success on licensure and certification exams where such data are available; and
- Eligibility to sit for licensing/certification exams upon graduation as a precondition for employment or to perform certain functions in those states in which the educational program is offered, including other factors that may prevent an applicant from qualifying for such employment such as a prior criminal and/or financial record or a preexisting medical condition.



**We must never misrepresent any facts or data concerning our education systems.**

To assist with full and transparent disclosure of important materials, each education system has student consumer information available online. Admissions employees must introduce this information to potential students during meetings, either in-person or through electronic means such as the telephone or the Internet. In addition, in or about mid-2016 a requirement will be implemented stating that prospective students must be given a “Single-Page Disclosure Sheet” for the program of study in which the student is seeking to enroll prior to signing an Enrollment Agreement.

Consumer information can be found on the website of each institution.

Prospective “on ground” students, or those who are attending classes in-person at a campus location, must be given the opportunity to tour the school prior to enrollment. All incoming students (other than graduate students and students who have already obtained 24 or more credits at the post-secondary education level) are required to complete an online and/or in-person orientation program prior to their first class at no cost to the students.



Consumer information can be found on the website of each institution.

## ENGAGEMENT WITH PROSPECTIVE AND CURRENT STUDENTS

We must make sure that we exemplify the following key principles to ensure appropriate treatment of all prospective and current students:

- Treat students equitably, and without bias. We respect and abide by policies related to harassment, discrimination, and diversity in our treatment of and interaction with students.
- Respect the privacy of students. The confidentiality of personal information and records of our students, including documents containing personally identifiable information (“PII”), is to be handled with care in accordance with EDMC’s Information Security policies.
- Work together to create a receptive learning environment that treats students’ opinions with respect and consideration. When students are encouraged to voice opposing points of view, we create a scholastic atmosphere that allows for critical thought and quality discussions.
- Be honest and transparent in communicating with students.

Student PII is never to be used or accessed for curiosity, personal interest, or advantage and shall not be shared with any competitor. PII may only be shared within EDMC for the purposes of performing official job responsibilities. PII may be shared with companies that perform services on EDMC’s behalf.

## FINANCIAL AID

Our financial aid professionals are dedicated to helping students achieve their educational potential by providing information about appropriate financial aid resources. Employees who deal with Federal Student Aid in any capacity are responsible for knowing and abiding by the provisions of Title IV, which governs the administration of federal student financial aid programs. Prospective students must be given the opportunity to meet with a financial aid professional, either electronically or in person, prior to enrollment.

Financial aid professionals at each institution must ensure that they provide the following services or information to current and prospective students, where appropriate:

- Provide financial aid services to those who qualify in an effort to seek to minimize economic disadvantages;
- Advise a student of his or her right to reject any particular type of financial aid that may be available;
- Provide timely, complete, and accurate financial aid information to students for the purpose of enhancing student financial literacy and empowering participants in the process to act and borrow responsibly; and
- Recommend that students/parents review federal and state provided methods of financing the students' education before determining whether to apply for available private student loans to supplement the costs.

We may never knowingly permit or encourage applicants to falsify or provide misleading information on applications for financial aid.

Each institution must also have and apply a fair and equitable refund policy in compliance with federal, state, and accreditation requirements, as well as the requirements of the Consent Judgment. Refunds shall be paid on or before the date the payments are required to be made.

EDMC has also adopted a *Student Loan Code of Conduct* to ensure the integrity of the student aid process and ethical conduct of EDMC employees related to student loan practices. This document applies to all presidents, business supervisors, directors of admissions and student financial services, and faculty employees within the student financial services department at an EDMC post-secondary institution or campus ("Covered Employees"), and provides specific policies and prohibitions addressing, among other topics, conflicts of interest, gifts and business courtesies, and interactions with students and parent borrowers. All Covered Employees are responsible for knowing and complying with the *Student Loan Code of Conduct*, which is available in the PPS Library.



**Our financial aid professionals are dedicated to providing information about appropriate financial aid.**



## MARKETING MATERIALS

We must ensure the accuracy of communications, both to the public and to prospective and current students. Only authorized agents or employees may make statements or release disclosures on behalf of EDMC, or otherwise publish or disseminate information relating to the Company or a particular education system or institution. In addition, marketing, advertising, and other communications must comply with the guidelines of EDMC's Business Practices Committee (BPC). The BPC is a multi-departmental group tasked with approving materials, providing advice, reviewing changes, and providing support as part of the compliance review process.

**All materials created and disseminated by third-party vendors must also comply with both the Consent Judgment and the Vendor Compliance Guide.**



**We are committed to providing quality education to military members and their families.**

## PRINCIPLES OF EXCELLENCE FOR MILITARY MEMBERS, VETERANS, AND MILITARY FAMILIES

We respect and honor the actions and sacrifices of those who have served or are serving in the United States military, as well as their family members.

The EDMC family of education systems is committed to providing quality education to veterans, active duty service members, members of the National Guard, reservists, and their families to assist them in attaining their educational goals. To that end, we are committed to the Principles of Excellence established by the U.S. Departments of Defense, Veterans Affairs, and Education in order to ensure that they receive accurate and meaningful information about both the financial costs and academic programs offered at our schools. We are also committed to providing accommodations for service members who may be absent for a period of time due to service requirements, as well as offering them flexible procedures for readmission upon return from duty.

For additional information regarding the commitment of EDMC and its education systems to current and former members of the U.S. military and their families, please refer to the PPS Library.





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EDMC and its education systems are committed to complying with laws and regulations applicable to its education systems and its business. As employees of EDMC and its education systems, we must be aware of and comply with federal, state, and local laws, regulations, and accreditation standards or policies and procedures that apply to our work. To the extent that particular positions or activities are governed by specific laws or restrictions, supervisors of those positions are charged with communicating to and educating their employees about their responsibilities and obligations.

In instances where U.S. laws, regulations and standards relating to ethical conduct are more restrictive than those of a particular foreign locality, our conduct shall be governed by U.S. standards.

EDMC and its education systems have also developed business standards and policies to support and assist us in meeting our external obligations. These standards and policies include our treatment of vendors and suppliers, and our expectations surrounding potential, perceived, and actual conflicts of interest.



**We are committed to complying with laws and regulations applicable to our education systems and our business.**



## ACTUAL AND POTENTIAL CONFLICTS OF INTEREST

As employees of EDMC and its education systems, we each have a duty to conduct our business and ourselves with the utmost integrity. However, at times it can be difficult when our personal interests interfere – or seem to interfere – with the interests of EDMC. As employees, we are expected to act in the best interests of EDMC, to disclose and resolve any actual or potential conflicts of interest in advance, and to avoid the appearance of any such conflict.

A “conflict of interest” occurs when the private interest of an employee either interferes or appears to interfere with the corporate interests of EDMC or its education systems. It is imperative that we, as employees, be proactive in the recognition of those relationships or interactions that may be perceived to call our professionalism into question.



A conflict of interest may arise when you, a family member, or a friend:

- Engage in activities that compete with, or appear to compete with, the interest of EDMC or an affiliated school;
- Let business decisions be influenced, or appear to be influenced, by personal or family interests or friendships;
- Use company property, information, or resources for personal benefit or the benefit of others;
- Hire, supervise, or have a direct or indirect line of reporting to a family member or someone with whom you have a romantic relationship;
- Maintain outside employment that negatively affects your job performance or interferes with your job responsibilities.
- Receive a personal loan or any guarantee of such a loan by EDMC or an affiliated school; and
- Receive any personal or financial benefit from, have a financial interest in, provide services to, or work for a student, employer of our graduates, supplier, contractor, competitor, or company that seeks to do business with EDMC or one of its education systems.

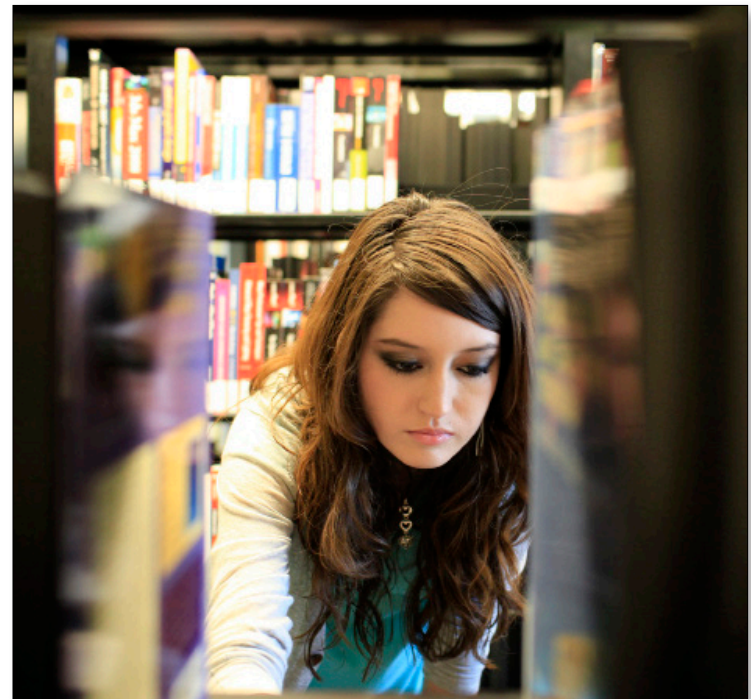
The above guidelines should help you recognize and avoid potential conflicts of interest. Please remember that conflicts of interest are not restricted to these guidelines.

Conflicts of interest are common, and having one is not always a violation of this Code. However, failing to disclose an actual or potential conflict of interest is a violation. You have a duty to immediately disclose any potential conflicts of interest to EDMC’s General Counsel. If the Chief Executive Officer or a director believes that he or she may have a potential conflict of interest, he or she must report the concern immediately to the Chairman of the Board of Directors.



## ANTITRUST REGULATIONS

Antitrust and related laws are designed to protect against illegal restraint of competition. We will not engage in or attempt to engage in agreements with competitors or suppliers to fix or illegally discriminate in pricing, participate or attempt to participate in any form of bid rigging, or engage in discussions or attempt to engage in any division or allocation of markets, territories, or clients with our competitors. If you are conducting meetings with competitors for any purpose, you must first consult with the Legal Department.



**You have a duty to immediately disclose any potential conflict of interest to EDMC's General Counsel.**

## CONTACT WITH ACCREDITATION, LICENSING OR REGULATORY AGENCIES

If you become aware of an event or communication from a regulatory agency which could affect the accreditation or regulatory status of EDMC or one of its institutions, or otherwise present a legal or compliance issue, you must immediately notify your supervisor and the Vice President of Accreditation and State Licensing or Legal Department.

### **Vice President of Accreditation and State Licensing**

Education Management Corporation  
210 Sixth Avenue, 3rd Floor  
Pittsburgh, PA 15222-2603  
770-918-2599

### **Legal Department**

Education Management Corporation  
210 Sixth Avenue, 3rd Floor  
Pittsburgh, PA 15222-2603  
412-918-5498

You may also call the Corporate Compliance Hotline. EDMC's General Counsel may become involved, if appropriate. Investigation of the matter will proceed as outlined in the "Investigation" section of this Code and in accordance with the internal policies of EDMC and its education systems.

## Disclosures to Regulatory Bodies

As employees of EDMC or its education systems, we are committed to ensuring that we disclose full, fair, accurate, timely, and understandable reports when communicating with the U.S. Department of Education, any other regulatory body or government agency, and the public. To guarantee the accuracy and completeness of every disclosure, only authorized agents or employees may distribute these reports or speak on behalf of EDMC and its education systems.

It is a violation of this Code to make or cause to be made a false statement to a governmental official or auditor, or to conceal or cause to be concealed a material fact called for in a government report or other filing.



## Contact with the U.S. Department of Education

If you become aware of a non-routine event or communication from the U.S. Department of Education which could impact the status of EDMC or one of its institutions or otherwise present a legal or compliance issue with the U.S. Department of Education, you must immediately notify your supervisor and the Senior Vice President of Student Finance and Compliance.

Please refer to the Institutional Eligibility - U.S. Department of Education and State Agency Approval and Notification [Institutional Eligibility – U.S. Department of Education and State Agency Approval and Notification Requirements](#) policy located on PPS for further guidance.

### **Senior Vice President of Student Finance & Compliance**

Education Management Corporation  
210 Sixth Avenue, 33rd Floor  
Pittsburgh, PA 15222-2603  
412-995-7206

## Government Inquiries and Review

Each of us is responsible for cooperating fully with internal investigations, as well as all requests and processes initiated by government or regulatory authorities. In such interactions, as in all our work, we are obligated to be honest, respectful, timely, and thorough.

If approached directly by a government office to provide non-routine information or to participate in a review or investigation, you must immediately contact your supervisor and EDMC's Legal Department before taking any action. They will ensure appropriate actions are taken to comply with the request.

## Media Inquiries

Occasionally, you may receive an inquiry from the media requesting information or comment on either EDMC or its education systems. In order to ensure that all communications offered to the media are honest, ethical, accurate, objective, timely and conform to sound business practices, only designated spokespersons are authorized to communicate publicly on behalf of EDMC and its education systems. Therefore, all inquiries should be referred to the Corporate Communications Media Hotline at 1-888-597-7665. You may also send an e-mail to [newsroom@edmc.edu](mailto:newsroom@edmc.edu).



## CORPORATE OPPORTUNITIES

Employees at EDMC and its education systems have a personal duty to advance the legitimate business interests of EDMC and its education systems when presented with the opportunity to do so. This means that as employees, we may not take any corporate opportunity for ourselves that was discovered through the use of EDMC's corporate property or information. We may not use any corporate property or information for either economic or personal gain. Further, we are prohibited from competing with EDMC or its education systems in any manner.



**All employees are obligated to ask questions and raise concerns if they observe any unethical or unfair activity in the workplace.**

## DEALING FAIRLY AND ETHICALLY WITH OTHERS

We endeavor, under all circumstances, to be guided by principles of fairness when conducting our business and ourselves. This commitment is shared at every level of our organization, and means that we deal fairly with our students, employers of our graduates, suppliers, and colleagues. This dedication to fair dealing extends to our interactions with and about our competitors. We must not disparage companies in the same business, or make untrue claims about their products or services.

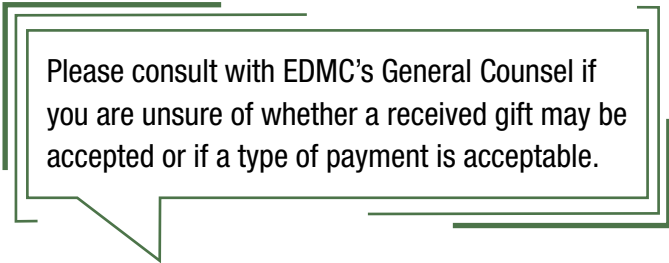
As employees of EDMC and its education systems, we must not take unfair advantage of others through unethical dealing practices. We must not manipulate, conceal, abuse, or misuse privileged information or misrepresent any material fact regarding our business or services. As part of our commitment to fair dealing and in order to ensure consistent treatment of inappropriate action, we have instituted measures to prevent and respond to any illegal, improper, corrupt, or unethical actions. Please refer to the "Seeking Guidance and Reporting Concerns" portion of this Code for more information. All employees of EDMC and its education systems are obligated to ask questions and raise concerns if they observe any unethical or unfair activity in the workplace.

## FOREIGN CORRUPT PRACTICES ACT (“FCPA”)

Employees of EDMC and its education systems are prohibited from making a payment and/or offering or promising anything of value to any foreign government official, agency, political party, or political candidate, or their family members in exchange for a business favor or which is otherwise intended to influence such individual or agency to gain a competitive or improper business advantage. These prohibitions apply to actions taken by employees as well as others engaged directly or indirectly by the company.

## GIFTS AND ENTERTAINMENT

Employees who give or receive business gifts or favors, or provide or accept business entertainment must do so only when the proposed activities are appropriate. Because no clear guidelines exist to define the point at which social courtesies may be regarded as improper or unethical payments, extreme care must be taken in this regard. The following guidelines regarding receipt of gifts, illegal or unethical payments, and appropriate business entertainment will help you recognize and avoid improper activities, and clarify acceptable interactions.



**Please consult with EDMC's General Counsel if you are unsure of whether a received gift may be accepted or if a type of payment is acceptable.**

## Receipt of Gifts and Entertainment

Employees must be cautious when accepting entertainment or gifts from third parties with whom EDMC or its education systems either directly or indirectly does, has, or is seeking to do business. Modest business entertainment may only be accepted in certain scenarios and must not create an expectation or inference of an obligation by the beneficiary to the giver. Employees should consult with EDMC's General Counsel if they are unsure whether a particular activity is appropriate.

The following direct and indirect forms of compensation are strictly prohibited:

- Separate individual payment or commission arrangements;
- Personal loans or services;
- Gifts from either current or prospective students;
- Excessive entertainment and travel; and
- Gifts of more than nominal value from other than current or prospective students.

Should any of these gifts be offered by a third party or student, it must respectfully be declined, unless you have received prior written approval from your supervisor and EDMC's General Counsel. If receipt of a gift is unavoidable, you must report the gift to EDMC's General Counsel for a determination of whether you may retain the gift or whether it must be disposed of properly.

Employees who engage in “covered activities” under the U.S. Department of Education's incentive compensation regulation are not permitted to receive anything of value, including gift cards, meals and additional PTO in connection with performing their job responsibilities.

Employees may accept seasonal or thank you cards, or similar tokens of gratitude from students.

## Appropriate Business Entertainment

The offering or hosting of certain business entertainment may be appropriate if it is not intended to affect the recipient's intentions.

Reasonable business entertainment, such as lunch, dinner, or an occasional athletic or cultural event may be extended to or by third parties in certain circumstances. The nature, frequency, and cost of any entertainment are factors that must be considered in determining whether it is appropriate. Further, the presentation of modest gifts may be appropriate in very limited contexts. Employees must consult with EDMC's Legal Department prior to offering any gifts or extending any invitations to business entertainment to determine whether such an offer is appropriate.

As set forth above, there are different considerations based on who is giving a gift and who is receiving the gift. It is important to consult with EDMC's Legal Department for directions prior to offering, giving, or accepting any gift, entertainment or favor.



## ILLEGAL OR UNETHICAL PAYMENTS – ANTI-BRIBERY

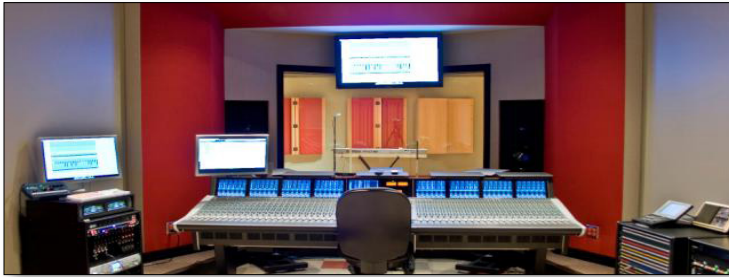
EDMC and its education systems do not permit illegal, improper, corrupt, or unethical payments of cash, property, or services to be made by, or on behalf of, EDMC or any education system in order to secure or retain, or attempt to secure or retain, business or other advantages. Payments to any employee of an EDMC customer or supplier in order to influence that employee's actions are strictly banned. Such payments constitute a crime in most U.S. and foreign jurisdictions. Even when not considered criminal, they are regarded by EDMC as unethical payments, and are not permitted.

Further, no employee of EDMC or its education systems is permitted to offer any payment of cash, property, or services to any prospective or current student. This includes offers made to pay tuition or an application fee on behalf of a prospective student. The distribution of application fee waivers may be appropriate in certain circumstances if done pursuant to the policies of an educational institution. For more information on student financial aid and assistance, please review the Student Loan Code of Conduct, available on the Intranet in the PPS Library.

All payments due by EDMC to its vendors or suppliers for fees, commissions or other similar payment obligations are to be paid by a corporate check or draft, bank wire transfer, or other authorized means. Such payments must be made payable to the order of the recipient or his authorized agent. The use of currency or other forms of "cash" payment is not acceptable under any circumstances.

## INTELLECTUAL PROPERTY

EDMC and its education systems have ownership interests in intellectual property assets, including materials, inventions, or ideas that may be copyrighted, trademarked, or patented using an institution's brand identity, name and logo. We all have an obligation to preserve the intellectual property ownership interests of EDMC and its affiliated schools. Further, as part of EDMC's commitment to fair dealing, all employees are prohibited from using or disclosing the intellectual property or trade secrets of third parties including competitors. Questions or concerns regarding the use of intellectual property or fair use under the federal Copyright Act should be referred to EDMC's General Counsel.



## INTERNAL CONTROLS - SEGREGATION OF DUTIES

EDMC and its education systems are committed to ensuring that employees have the appropriate access to perform their jobs, as well as ensuring that individuals do not have access which permits them to circumvent internal controls. "Segregation of duties" plays an important role in helping to establish a strong, effective control environment in many areas, including handling of financial transactions. Processing, approval, and monitoring should be segregated so that no individual has responsibility for more than one component while also ensuring that an individual has the least amount of access required to complete his or her job. Appropriate segregation of duties reduces the likelihood of errors and irregularities, and helps prevent fraud. All EDMC managers are responsible for ensuring appropriate segregation of duties within their department and should evaluate the access controls through performance of user access reviews, and when making organizational changes such as hiring a new employee or reassigning departments. For more information about our approach to Segregation of Duties, please refer to the PPS Library.

**We all have an obligation to preserve the intellectual property of EDMC and its education systems.**



## MAINTAINING ACCURATE COMPANY RECORDS

EDMC and its education systems are committed to keeping accurate and thorough business records that correctly reflect transactions and events. In accordance with this commitment, all of our financial books, records, and accounts conform to generally accepted accounting principles (GAAP).

We must work together to ensure that business records, statements, and entries, including financial statements, contracts, and agreements, are complete, properly authorized, and accurate and truthfully reflect the transactions they represent. This obligation for accuracy applies to all documents, no matter how insignificant they may seem, and is a responsibility of employees at every level of EDMC and its education systems.

As employees, we are accountable for the accuracy of business records handled in the normal course of business. We are prohibited from making false, artificial, misleading, or deceptive entries and from providing false information to, or otherwise misleading or improperly influencing, any internal or external auditors. If you notice an inaccuracy or error in any record, it is your responsibility to contact EDMC's Chief Compliance Officer or General Counsel to ensure that potential problems are reviewed and dealt with.



**We must never make a false or misleading entry on an academic record.**

## Accuracy in Academic Records

As a provider of higher education, employees at EDMC and its education systems come into daily contact with a variety of academic records, including admissions documents, grades, attendance reports, transcripts, and financial aid applications. We must never make a false or misleading entry on an academic record or otherwise tamper with it in any way. These records are also considered business records and must be handled with the same care as financial books and records of the company or an education system. A commitment to precision and accuracy with respect to our academic records will ensure that we provide the best possible service and that we hold ourselves to the highest standards of academic integrity.

## Accuracy in Regulatory Documentation

The Regulatory Affairs and Compliance Electronic Records Database ("RACER") is the official regulatory compliance repository and file of record for EDMC and its education systems. It is mandatory that all communications to or from a regulatory agency be promptly submitted to the RACER database. Detailed instructions describing both how to submit regulatory documentation or communications and how to request a report have been provided on the Regulatory Affairs and Compliance Intranet Site under the "Compliance" tab.

## POLITICAL PROCESS PARTICIPATION – ANTI-LOBBYING

We encourage employees to engage in their communities, to vote, and to participate personally in political functions and activities of their choice. Your job will not be affected by your personal political views or your choice in personal political contributions.

If you choose to participate in such activities, you must take particular care to ensure that any opinions and positions are viewed as your own and not attributed to EDMC or its education systems. Company funds, assets, or resources may not be used to support any personal political activities. EDMC will not reimburse employees for these activities. If you wish to seek an elected office or accept an appointed office, you must immediately notify your manager and EDMC's General Counsel to determine how the duties of the office may impact your job performance.

EDMC reserves the right to communicate its position on important issues to elected representatives and other government officials. EDMC is governed by local, state, federal, foreign, and other applicable laws, rules, and regulations when communicating with

government authorities and when making political contributions. Corporate political contributions and activities are strictly regulated and must always be approved by EDMC's Vice President of Government Relations and, if required, properly reported under applicable disclosure acts. If you have any questions concerning reporting please contact:

Legal Department  
Education Management Corporation  
210 Sixth Avenue, 3rd Floor  
Pittsburgh, PA 15222-2603  
412-918-2550



**Your job will not be affected by your personal political views or your choice in political contributions.**

## RECORDS MANAGEMENT

EDMC and its education systems have developed a uniform system for identifying, retaining, protecting, and disposing of the Company's records to promote compliance with statutory and regulatory requirements. We must retain only those records that are required to manage the Company and to satisfy its obligations to customers, students, employees, legal and regulatory authorities, and shareholders. As employees, we must ensure that management of all records is performed in a manner consistent with these internal records management policies.

In the event of actual or reasonably anticipated litigation, audit, or investigation, EDMC and its education systems will work with employees to preserve records potentially relevant to the subject matter of the litigation, audit, or investigation; which may include preservation of certain records beyond the records' applicable retention periods. Please refer to the "Records Management & Disposal Policy" available in the PPS Library for more information.

## RELATIONSHIPS WITH SUPPLIERS AND VENDORS

EDMC and its education systems are dedicated to purchasing goods and services in an ethical manner while continuing to maintain the best overall value for the Company. We must treat existing and potential suppliers and vendors courteously, fairly, and honestly and comply with any confidentiality agreements entered into with our suppliers or vendors.

We expect that our suppliers and vendors will conduct business activities on behalf of the Company in accordance with business standards and values that align with our own. Therefore, we require suppliers and vendors to comply with applicable local, state, and federal laws and regulations, as well as the laws and regulations of the country in which the supplier or vendor conducts its business or performs services. More information about our relationship with our suppliers and vendors can be found in the PPS Library.

## RELATIONSHIPS WITH THIRD-PARTY MARKETING VENDORS

All third party marketing and/or pay per lead vendors are required to comply with the provisions of our Vendor Compliance Guide in addition to any specific guidance from the Marketing Department. We expect all communications on our behalf to be truthful, accurate, and consistent, and to avoid any false, misleading, deceptive, abusive, or unfair acts or practices when communicating with prospective or current students. All materials or content created by a third party marketing vendor must be submitted for review to the BPC prior to being launched on behalf of an education system.

**We must ensure that management of all records is performed in a manner consistent with EDMC's internal records management policies.**

# OUR WORKPLACE ENVIRONMENT



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## CONFIDENTIAL AND PERSONALLY IDENTIFIABLE INFORMATION

All employees must respect and safeguard the confidential information of EDMC and its education systems. During your employment, you may come across confidential, competitively sensitive, or proprietary information about EDMC or its education systems, employees, prospective and current students, suppliers, vendors, competitors, or another third party. Such information may include financial information about EDMC or its education systems, business or marketing plans, information regarding disputes or audit results, and personal information or data about employees or prospective or current students.

All information gained through your work should be considered confidential information, unless it constitutes Employee Protected Communications. Employee Protected Communications are communications between non-supervisory employees regarding terms and conditions of employment, for example, wages and benefits, hours, working conditions, and personnel actions. The Company recognizes that its non-supervisory employees have certain rights under the labor laws to discuss among themselves, and with third parties, the terms and conditions of employment. This provision of the Code does not prohibit or otherwise interfere with non-supervisory employees' rights to engage in these Employee Protected Communications.

All confidential information (excluding Employee Protected Communications) must be protected and should not be shared with anyone outside of EDMC or its education systems, unless such disclosure is authorized by EDMC's Legal Department. Even within EDMC, confidential information (excluding Employee Protected Communications) should only be shared with other employees on a need-to-know basis.

If you leave EDMC or its education systems, you are prohibited from copying or retaining any documents or other material containing confidential information (excluding Employee Protected Communications). The obligation to maintain confidentiality of this information continues even after employment ends.



**All employees must respect and safeguard the confidential information of EDMC and its education systems.**

## Personally Identifiable Information

During the course of our employment, we may have access to the personally identifiable information, or “PII,” of prospective or current students or of other employees. PII, broadly defined, is information about an identified or identifiable person. Names, physical addresses, email addresses and telephone numbers are all examples of PII. PII, however, can include much more than names and addresses and some PII is considered sensitive because it can potentially be used to facilitate identity theft or otherwise harm individuals.

Examples of Sensitive PII include, but are not limited to:

- Social Security Number;
- Driver’s License Number;
- Passport Number;
- Other government identification number:
  - State identification card number, tribal identification number, alien registration number, taxpayer identification number, voter identification number, etc.
- Financial account numbers including credit card/debit card numbers, checking or savings account numbers, or any PIN numbers, passwords, identifiers or codes that enable access to those accounts;
- User IDs and Passwords;
- Protected health/medical/health insurance information;
- Digital or electronic signatures;
- Date of Birth;
- Mother’s maiden name; and
- Tax or salary information.

A more extensive list can be found in the Information Security section of the PPS Library.

This information must always be accessed responsibly and for business purposes only, and must be safeguarded in accordance with EDMC policies and procedures. We must never share this information with anyone outside of EDMC or our education institutions, except when authorized by the Legal Department, and it should only be shared within as needed for the purposes of performing official job responsibilities. PII is never to be used or accessed for curiosity, personal interest, or advantage. After its use, it must be properly disposed of through either approved physical or electronic means.

EDMC and its education systems have implemented an Information Security Program in order to create effective administrative, technical, and physical safeguards to protect the non-public personal information of our students and employees. EDMC and its education systems will continually evaluate electronic and physical methods of accessing, collecting, storing, using, transmitting, protecting, and disposing of this data to ensure that it adequately protects this important information. More information about EDMC’s Privacy and Information Security program, including policies and guidelines is available in the PPS library.



**PII is never to be used or accessed for curiosity, personal interest, or advantage.**

## HEALTH, SAFETY AND SECURITY IN OUR WORKPLACES

We are committed to providing safe, secure, and healthy work and learning environments for our staff, students, and visitors to our facilities. It is important for each of us to uphold this commitment by acting in a safety-conscious manner at all times. We must never ignore or avoid the safety rules in the locations where we work. In addition, we must comply with all applicable workplace health and safety laws. If we observe an actual or potential accident, injury, or unsafe act, we must immediately report this condition to a supervisor.

As colleagues, we are responsible for maintaining a positive and safe work environment – including one that is free of violence. Therefore we are committed to a workplace free of violence and unauthorized weapons, and do not tolerate violent conduct. We must never take – or tolerate – any action that is threatening, intimidating, bullying, or harassing, either in person or via electronic mediums such as the Internet. Any behavior that is threatening or harassing should be reported immediately to a supervisor. If you or your colleagues face immediate danger, contact the local authorities.

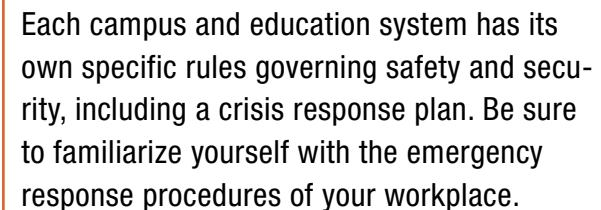
For more information on our commitment to workplace safety, please review the PPS Library. For specific information on rules and policies governing security and emergency situations at your location, please contact your local Human Resources department or the Director of Security:

Director of Security  
Education Management Corporation  
210 Sixth Avenue, 3rd Floor  
Pittsburgh, PA 15222-2603  
412-918-2660

**We are committed to providing safe and healthy work and learning environments for our staff, students, and visitors to our facilities.**

## Substance Abuse

Employees who work under the influence of drugs or alcohol pose an unacceptable safety risk to themselves and others. The use of illegal drugs, controlled substances, or the misuse of prescription medication while at work affects job performance and could harm the reputation of EDMC and its education systems. Therefore, any such use is a violation of this Code. If you observe someone whom you believe is working while impaired, contact your supervisor or an Employee Relations representative. If you have a drug or alcohol problem, you are encouraged to seek assistance. For more information on EDMC's views on drug prevention in the workplace, please see the PPS Library.



**Each campus and education system has its own specific rules governing safety and security, including a crisis response plan. Be sure to familiarize yourself with the emergency response procedures of your workplace.**



## NON-DISCRIMINATION

We are committed to diversity, and an environment where employees are treated fairly, have an equal chance to succeed, and are appreciated and treated with dignity and respect regardless of race, gender, color, religion, sexual orientation, gender identification, age, national origin, disability, medical condition, genetic information, marital status, veteran status, or any other basis protected by law.

We are dedicated to providing safe and healthy work and learning environments for our students, employees, and visitors. Each of us is responsible for creating a work place that is safe and free from abuse of any kind. We must be supportive of each other as well as to the mission, principles, and values that guide EDMC and its education systems.

We are also committed to providing equal access to higher education to prospective and current students. For more information on EDMC's non-discrimination policies and commitments to equal opportunities for employees and students, please review the documents available in the PPS Library.

Unlawful harassment of an employee by anyone, including any supervisor, co-worker, employee or student at one of our institutions, will not be tolerated and will be subject to disciplinary action.



Each of us is responsible for creating a work place that is safe and free from abuse of any kind.

## PROFESSIONAL RELATIONSHIPS – NON-FRATERNIZATION, NON-HARASSMENT

All employees at EDMC and its education systems are expected to conduct themselves in a manner which promotes a professional educational, business, and employment environment. Due to the inherently unequal relationship that exists between certain individuals, including supervisors and their subordinates and faculty or staff members and students, dating or other intimate social relationships can be problematic. Such relationships can easily degenerate into allegations of sexual harassment and expose employees and EDMC to potential legal problems.

In addition, the real or perceived problem of favoritism can have negative and far-reaching consequences and can seriously affect the management process as well as undermine the reputation of EDMC and its member institutions and its commitment to academic integrity. In order to avoid these potential problems, romantic, intimate, or sexual relationships between employees and their supervisors or between a student and a faculty or staff member are prohibited.

Prohibited fraternization between supervisors and subordinates or faculty/staff and students generally includes, but is not limited to, inappropriate socializing either off-campus/out of office or in connection with any non-sanctioned on-campus/office activity. These interactions may take place over the telephone, online, or over social media. Each academic institution or campus may have varying policies on the use of Internet or social media for academic purposes (i.e. group message boards, discussion posts, etc.). If you are a faculty or staff member, please check with your specific institution to determine the governing policies.



“Prohibited fraternization” includes inappropriate interactions that may lead to allegations of sexual harassment or the perception of favoritism.

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## Consensual Relationships

If you have a pre-existing relationship or if you become related, married, or involved in a romantic, intimate, or sexual relationship with a student or subordinate over whom you have or could be perceived to have advising, teaching, supervisory, grading, counseling, enrollment, or evaluation authority, you must immediately notify your supervisor and Human Resources and disclose the relationship. The supervisor, in conjunction with Human Resources, will determine if there is a way to address or mitigate any perceived, potential, or actual conflict of interest that might prove detrimental to EDMC or its education systems or either party. Members of senior management may assist in making this determination.

In some situations, the only possible mitigation strategy may be a transfer of one of the involved parties to another department. If such a transfer is not possible, a determination will be made as to which employee will remain.

In the context of student/faculty relationships, the faculty or staff member shall immediately be removed from having direct or indirect authority over the student's work or academic performance and from any advising or supervisory responsibilities related to the students. A further review of appropriate mitigation strategies will be conducted in order to address the situation.

Violation of this provision is considered a serious violation of company principles and may result in discipline, up to and including termination.





## PROTECTION AND USE OF TIME, EQUIPMENT AND RESOURCES

Employees of EDMC and its education systems are provided with certain resources and supplies to assist in efficient and effective performance of various work duties. Depending on the position, these items may include a computer, mobile device, software, or vehicle. When provided, Internet access is intended for business use and may not be used for any inappropriate, unethical, or illegal activity.

All employees should note that the email and internet message systems are the property of EDMC or its education systems and that any emails or text messages generated are not the property of the individual users. There should be no expectation of privacy in email or on any EDMC owned computer system or computer network. EDMC and its education systems may, without prior notice and for any reason, monitor, access, review, copy, delete, disclose, and distribute to any party any message sent, received, or stored on the email system or on any computer or network that makes up the EDMC computer and network infrastructure. Members of EDMC's Legal Department and the EDMC management team, or their designees, may record or monitor all communications to ensure that employees are being respectful and responsive to current and prospective students, as well as adhering to all applicable rules and regulations. Employees may be monitored or recorded at any time during without notification. For further information, please refer to the PPS Library. Employees who have received or use EDMC-provided computer systems or have access to any network of EDMC or its schools should familiarize themselves with these policies.

Incidental personal use of resources is allowed; however, misuse or wasting of either assets or work time is not permitted. We must use

common sense when using assets for personal reasons, and should ensure that any occasional use does not negatively affect productivity or violate policy. Use of these assets for an employee's personal benefit or the benefit of anyone other than EDMC or its education systems is prohibited. Abuse of any corporate asset, including, but not limited to, cash, corporate funds, supplies, fixed assets, information, and technology equipment, is considered a violation of this Code and will be investigated and dealt with accordingly.

Theft and loss have a direct impact on both profitability and productivity. As employees, we must take steps to ensure that any equipment or assets provided to us by the company are protected and handled responsibly. Any mobile phone, computer, or other device used in whole or in part for EDMC business purposes must have security protection which meets the standards of EDMC's Information Technology policies, and should be locked and stored in a safe place when not in use (e.g., in locked file drawers, hotel safes, automobile trunks). For more information, please refer to the "Confidential and Personally Identifiable Information" provision of this Code and any related policies in the PPS Library.



**We must take steps to ensure that any equipment or assets provided to us by the company are protected and handled responsibly.**



## SOCIAL MEDIA

As employees of EDMC and its education systems, we embrace the new opportunities available to us through social media. All corporate use of social media must first be approved by the BPC Compliance group in accordance with the Company's Social Media Guide, found in the PPS Library.

We must also avoid being perceived as an agent or representative of EDMC or its education systems in our personal use of social media. This means that if your personal use includes a reference to EDMC or its affiliated schools or education systems, it is best to make clear that your opinion does not represent those of EDMC or any particular institution.



For additional information regarding social media use, please refer to the "Social Media Policy" in the PPS Library.

**We must avoid being perceived as an agent or representative of EDMC or its education systems in our personal use of social media.**



# SEEKING GUIDANCE AND REPORTING CONCERNS

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As employees, we are obligated to ask questions and raise concerns when compliance issues arise in order to uphold the ethical standards of EDMC and its education systems. We cannot keep silent about an issue or activity which we believe is a violation of our Company's values, principles, and ethics, nor should we assume that management already knows about or is not concerned with a potential problem. Instead, we must speak up and do the right thing.

When we seek guidance and report concerns by following the process outlined below, we help EDMC and its education systems maintain its reputation for quality in educational services.



## RAISING A CONCERN AND REPORTING A VIOLATION

### Good Faith Reporting

We are committed to creating a safe environment in which employees feel comfortable raising concerns regarding compliance issues. EDMC and its education systems will protect any employee who raises a concern honestly and in “good faith.” Good faith reporting does not mean that an employee has to be “right” when they raise a concern or that any of the suspected violations need to have actually taken place; the employee must honestly believe that the information they are providing regarding an alleged violation is accurate. Any employee who knowingly submits a false report of a violation, is not truthful during an investigation, or who interferes with or fails to cooperate with a Code investigation will be subject to disciplinary action.

### Reporting Violations

There are many ways for you to voice your concern. The accompanying charts present an overview of the options available based on the type of violation you need to report.

Everyone has a duty to promptly report violations of this Code and raise their concerns.



## If you have a concern regarding:

- Violations of a law or regulation
- Violation of the Code of Conduct

You should first raise the concern to your immediate supervisor. If you are uncomfortable sharing your concern with your supervisor, or are dissatisfied with his or her response, then you should follow the subsequent escalation order:

- Next level management
- Human Resources representative
- Employee Relations Team

If you are unsatisfied with the guidance or direction provided at any level of the process, you should take your concern to the next level.

You may also use the Corporate Compliance Hotline, either by phone at 1-866-439-6805 or via the Internet at

<https://www.reportlineweb.com/edmc>

You may also raise your concern directly to the Legal Department at [edmclegal@edmc.edu](mailto:edmclegal@edmc.edu).

- Discrimination, Harassment, or Sexual Harassment
- Retaliation

You should make your complaint directly to your Campus President or Employee Relations (1-855-642-6980).

You may also use the Corporate Compliance Hotline, either by phone at 1-866-439-6805 or via the Internet at

<https://www.reportlineweb.com/edmc>

- Interpersonal conflict
- Unprofessional conduct
- Dress code violations
- General managerial complaints
- Any other issue

You should first raise the concern to your immediate supervisor. If you are uncomfortable sharing your concern with your supervisor, or are dissatisfied with his or her response, then you should follow the subsequent escalation order:

- Next level management
- Human Resources representative
- Employee Relations Team

If you are unsatisfied with the guidance or direction provided at any level of the process, you should take your concern to the next level.

- Potential fraud
- Accounting irregularities
- Audit matters

You should make your complaint directly to the Legal Department.

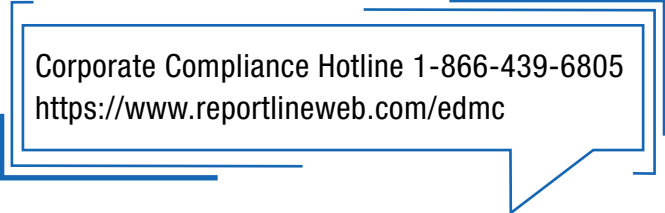
You may also use the Corporate Compliance Hotline, either by phone at 1-866-439-6805 or via the Internet at

<https://www.reportlineweb.com/edmc>

**EDMC and its education systems will protect any employee who raises a concern honestly and in “good faith.”**

## CORPORATE COMPLIANCE HOTLINE

The Corporate Compliance Hotline is a confidential, third party option for reporting suspected illegal and unethical activity. It is available to all EDMC employees and vendors to report compliance concerns 24 hours a day, 7 days a week.



Corporate Compliance Hotline 1-866-439-6805  
<https://www.reportlineweb.com/edmc>

## CONFIDENTIALITY AND ANONYMITY

EDMC and its education systems maintain confidentiality in all investigations to the extent possible under the circumstances and in accordance with EDMC's legal obligations. You may remain anonymous if you make a call to the Corporate Compliance Hotline.

## INVESTIGATION OF REPORTED CONCERNS

We take all reported concerns seriously. We will investigate all matters brought to our attention; make a determination whether this Code, any policy, or any law or regulation has been violated; and take appropriate corrective action.

All employees are required to cooperate with any investigations conducted by the Ethics Committee, Internal Audit, the Audit Committee, or the Employee Relations team. EDMC and its education systems will not tolerate any retaliatory actions taken against individuals for their participation in these investigations.

### Student Concerns

Any concerns raised by a student or prospective student should be entered into the student portal or forwarded to the Student Resolution Team by e-mailing [studentresolution@edmc.edu](mailto:studentresolution@edmc.edu). The Student Resolution Team will evaluate the concern and determine whether the concern needs to be forwarded for further investigation by the Ethics Committee or any other department.

### Corporate Compliance Hotline Concerns

When you raise a concern using the Corporate Compliance Hotline, it will be relayed to representatives of the Ethics Committee. The Committee may delegate to either the Employee Relations team or to local or campus management for investigation; however, the Ethics Committee maintains oversight of the investigation and any remedial action that may follow. If corrective action is required, EDMC and its education systems will promptly determine the steps to take to address the problem and prevent its recurrence.

### Employee Relations Concerns

When you raise a concern to the Employee Relations team, it will be evaluated individually. If the complaint alleges fraud, accounting irregularities, audit matters, or any violations of laws, regulations, or the Code of Conduct, it will be relayed to representatives of the Ethics Committee. If the concern is not related to those matters, it will be characterized as either an "Employee Relations" matter or a "Managerial" matter which may be delegated to campus or local management for resolution.

### Fraud or Audit Concerns

Occasionally, EDMC and its education systems will investigate certain matters relating to fraud, accounting irregularities, and audit issues through the Internal Audit and Compliance Monitoring departments. Depending on the nature of the issue, some of these matters may be reviewed by the Audit Committee or its Chairman.

**You may remain anonymous if you make a call to the Corporate Compliance Hotline.**

## NON-RETALIATION – “OUR COMMITMENT TO YOU”

We appreciate employees who identify potential problems that could affect the business or reputation of EDMC and its education systems.

**No adverse employment action may be taken against an employee for reporting or participating in any investigation, including cooperation or assistance with the Administrator or his or her delegate related to their powers and duties to ensure implementation of and compliance with the Consent Judgment.** Prohibited adverse employment actions include, but are not limited to, termination, demotion, suspension or loss of benefits, negative performance review, discrimination, harassment, or threats.

If you discover that you work with someone who has raised a concern or participated in an investigation, you must continue to treat that person with courtesy and respect. **Any retaliation against an employee who makes a good faith report or in good faith cooperates with an investigation is a violation of this Code.** If you believe that you have been the victim of retaliation, you should immediately report the matter to the Legal Department, your Employee Relations representative, or the Corporate Compliance Hotline in order to ensure that the matter is fully and properly investigated.

## POLICIES, PROCEDURES, AND STANDARDS LIBRARY

EDMC and education system-specific policies, procedures, and standards have been developed to both supplement and clarify the general principles set forth in the Code.

The PPS Library is available through EDMC’s Intranet and through the Go.EDMC portal. This helpful resource includes documents that apply across the organization, as well as those that apply to specific institutions or education systems. You should always check the PPS Library to view the most current version of a Policy, and to review any changes that may have been made.

Any questions regarding the PPS Library or any of its documents should be referred to the Legal Department via email at [edmclegal@edmc.edu](mailto:edmclegal@edmc.edu).

## OUR CODE IS NOT A CONTRACT

Our Code is not a contract. It does not create or imply any specific employment rights or guarantee employment for any specific period of time.

**EDMC**  
Education Management Corporation

TEAMWORK · INNOVATION · LEADERSHIP · INTEGRITY · EXCELLENCE · RESPECT



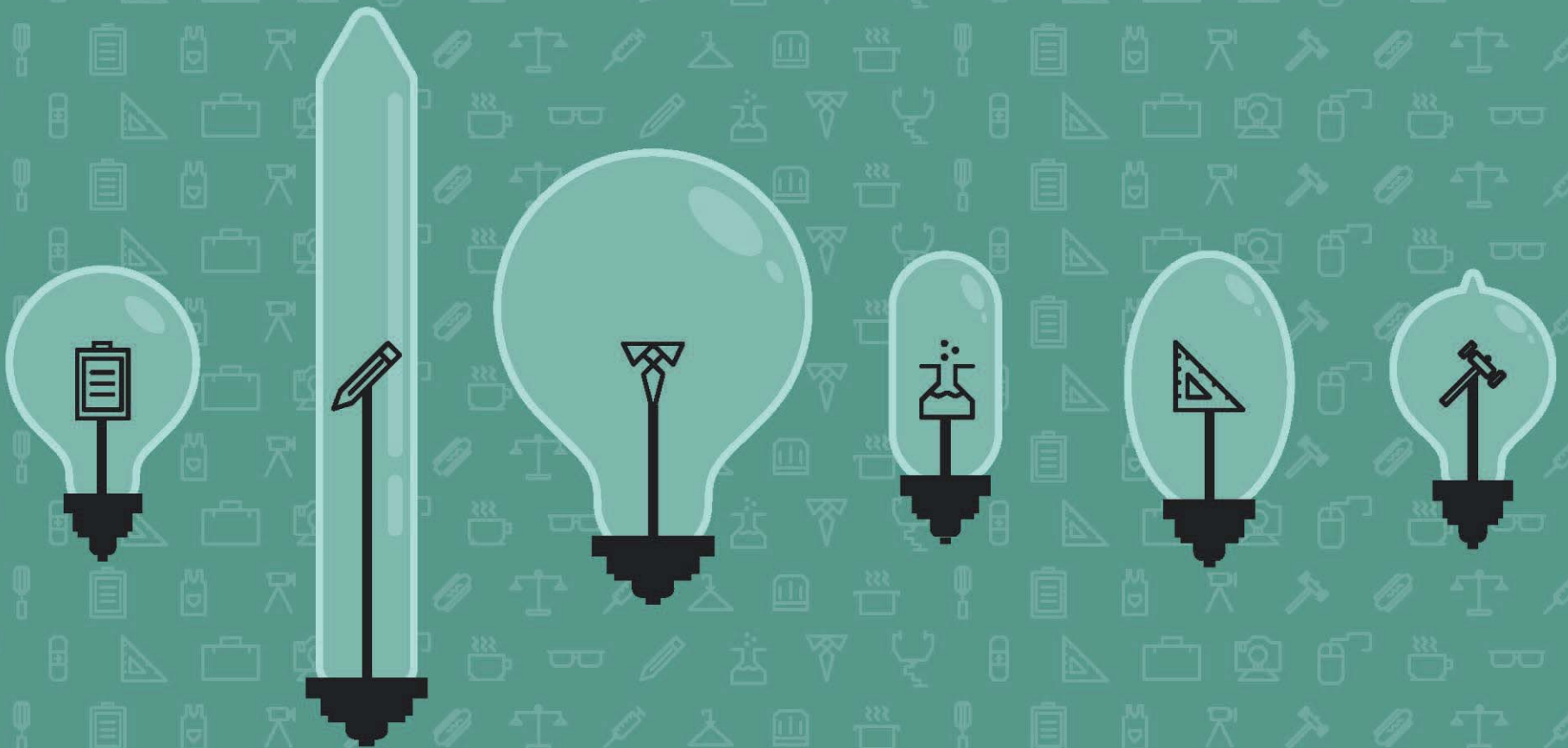
## CONSEQUENCES OF NON-COMPLIANCE

Non-compliance not only affects us, but it affects our students and our schools. Any EDMC employee who violates or attempts to violate the Code or our policies, or fails to report a Code violation may be subject to disciplinary action, up to and including termination.

## ASKING QUESTIONS ABOUT THE CODE

If you have a question or suggestion about the Code or any policy or procedure in the PPS Library, you may contact the Legal Department directly by e-mailing [edmclegal@edmc.edu](mailto:edmclegal@edmc.edu). Your inquiry will be reviewed and, if necessary, submitted to the appropriate individual or department for response or clarification. There should be no expectation of anonymity when directly contacting the Legal Department via email.





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