



Grand Canyon Education Policies & Procedures

Policy Name: Human Rights Policy	Pages: 4
Department: Legal	Policy Number: 207
Subsection:	Effective Date: 10/31/2018 Revision Date:

Overview

Grand Canyon Education (“GCE”) shares the common goal of each partner to improve lives through higher education and to champion student success while keeping tuition accessible for all socioeconomic students to ensure the legacy of the institution for generations to come. GCE provides innovative educational learning solutions that promote student success and institutional growth in accordance with the guiding principles and ideals of the Christian faith. This policy is guided by international human rights principles encompassed by the UN Universal Declaration of Human Rights and UN Guiding Principles on Business and Human Rights.

Scope

This policy applies to all employees, including student workers.

Policy

GCE is a Christian institution that embraces a biblical worldview which outlines a responsibility to fulfill the Great Commandments which, simply stated, are "to love God and to love our neighbor." We are a community of people who value the pursuit of truth and find great understanding in the convergence of viewpoints, backgrounds and ideas. GCE, while reserving its lawful rights where appropriate to take actions designed to ensure and promote the Christian principles that sustain its mission and heritage, welcomes employees from all walks of life which has contributed to a growing diversity within our community. Our diversity encompasses a multitude of dimensions, including age, disability, national origin, race, color, religion, gender, veteran status and more. We believe that all people, without exception, bear the image of God and have been designed to reflect His love and creativity. Our Christian perspective compels us to treat every individual equally with respect and compassion. All employees deserve a comfortable space to express their feelings so that every voice is heard. All employees and members of the GCE community will find inclusion, value and safety within this community. Finally diversity not only enriches the educational endeavor, but is critical to it. It will help prepare us for the varied world in which we reside. Maintaining a diverse environment requires of measure of tolerance and understanding commensurate with the dignity and value of all human life. In sum, GCE values every employee entrusted to its care.

As employees of a service organization that supports institutions of higher education, we serve as mentors, advisors, and colleagues to students, parents, alumni, faculty, and staff. We model behaviors for students to practice in their professional lives by conducting business with integrity, believing in our mission and values, and treating all with respect and dignity. It is expected that each GCE employee will carry out his or her responsibilities with honesty and integrity and will act in compliance with applicable company policies and governmental laws, rules, and regulations to that the Company’s stakeholders may have confidence in the integrity of GCE.

Principals of Our Ethical Business Practice

- Respect the lives, rights, privacy and property of others;
- Avoid all conflicts of interest as outlined in GCE’s Code of Conduct, Conflicts of Interest and Whistleblower Policy;



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- Disclose any conflicts or potential conflicts of interest to the Compliance Officer, as identified in GCE's Code of Conduct;
- Conduct duties and business relationships in an honest, fair and responsible manner;
- Sustain a culture in which ethical conduct is valued and recognized;
- Endorse accessibility and provide products and services in a manner that respects the independence and dignity of persons with disabilities;
- Maintain safe, healthy and secure work environments;
- Sustain responsible trading practices with all Suppliers to promote decent, legal and humane working conditions (see GCE's Supplier Code of Conduct);
- To use resources, material and energy as efficiently and responsibly as possible in the provision of products and services (see GCE's Environmental Policy);
- Foster a business environment that encourages open communication and seeks out, listens and responds to the ideas and concerns of stakeholders;
- Behave in a manner that is both ethically responsible and accountable at all times in upholding the public interest and will withstand public scrutiny;
- Provide timely, full and true disclosure of material information, both financial and non-financial, concerning the business and affairs of GCE to the public;
- Comply with applicable laws and GCE policies and procedures.

Accessibility

GCE will endorse accessibility and ensure the needs of those with disabilities are accommodated, recognizing the use of assistive devices, support persons, service animals, availability of documents and notices in alternative formats and applicable accessibility training.

Health and Safety

GCE will provide healthy and safe workplaces and comply with relevant health and safety laws. GCE will:

- Provide its workers with safe and healthy work environments which, as a minimum standard, is in compliance with State and Federal health and safety laws and regulations.
- Take adequate steps to prevent accidents or injuries to health arising out of, associated with, or occurring in the course of work.
- Provide health and safety training appropriate for their industry.
- Ensure that the all equipment and tools, including personal protective equipment are in proper working condition, maintained and certified
- GCE will ensure workers are free to express their concerns about workplace conditions without fear of retribution of losing their jobs in accordance with its Open Door Policy.



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Workplace Violence

- GCE is committed to providing a safe environment that is free from acts of violence or threats of violence. GCE does not tolerate behavior that is violent, threatens violence, harasses or intimidates others, or disrupts the workplace or the academic environment. Anyone found to be responsible for threats of or actual violence or other conduct that is in violation of GCE policy or guidelines will be subject to prompt corrective action up to and including termination of employment.
- GCE specifically discourages employees from engaging in any verbal or physical confrontation with a violent or potentially violent individual. The Company expects employees to use reasonable judgment in identifying potentially dangerous situations. Employees have a “duty to report” to management or security personnel any suspicious workplace activity, situation, or incident about which they become aware in accordance with the procedures described below. Employees should not place themselves in peril, nor should they attempt to verbally or physically intercede during an incident.
- Prohibited Conduct - Threats, threatening language or any other acts of aggression or violence made toward or by any Company employee, customer, visitor or business associate will not be tolerated. GCE treats threats coming from an abusive personal relationship as it does other forms of violence.
- For purposes of this policy, a threat includes any verbal, written or physical harassment or abuse, any attempt at intimidating or instilling fear in others, menacing gestures, flashing of weapons, stalking or any other hostile, aggressive, injurious or destructive action.
- Domestic Violence – includes a person who has a personal relationship with a worker- such as a spouse or former spouse, current or former intimate partner or a family member- who may physically harm, threaten or attempt to physically harm the worker while at work.
- Workplace - includes the working environment and any place employment-related activities are conducted including business travel, work-related social gatherings or any other location that may have a subsequent impact on the workplace.

Employment Standards

GCE will employ employees who are, in all cases, present voluntarily, not put at risk of physical harm due to their work environment, fairly compensated and allowed the lawful right of free association.

Wages and Benefits

GCE will provide wages and benefits that comply with state and federal employment and labor laws, pay workers and provide workers with clear, written accounting of hours worked, deductions and regular and overtime wages in a language they can understand.

Child Labor

Child labor is prohibited. In addition, GCE encourages the use of products that have been made in factories in countries where children are used as slave labor or other exploitive circumstances, which impede child development.



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Forced or Slave Labor

GCE will not use any form of forced or slave labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

Disciplinary Practices

GCE will not use corporal punishment or other forms of mental or physical coercion.

Related Policies

Policy Name	Location
Code of Conduct, Conflict of Interest and Whistleblower Policy	Employee Handbook
Open Door Policy	Employee Handbook
Code of Conduct	GCENet Policy Center
Whistleblower Policy	GCENet Policy Center

Date	Version: Original or Revised	Approved By
10/31/2018	Original	Dan Steimel