



GRAND CANYON EDUCATION

Human and Labor Rights Policy

COMMITMENT

Grand Canyon Education, Inc. and its subsidiary and affiliated entities (“GCE” and “Company”), has the utmost respect for the inherent dignity of all persons. The Company is committed to respecting human rights as recommended by the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. The Company strives to support the provision of basic human rights, maintain non-discriminatory practices, and create positive action within our community. GCE continues to evaluate outcomes and the implementation of this policy. This policy is guided by non-legally binding and internationally recognized human rights as defined by the International Bill of Human Rights, which includes the Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights; and the International Covenant on Economic, Social and Cultural Rights, as well as the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

SCOPE

We believe our main responsibilities lie in a number of critical areas: employee rights, promoting access to higher education, positive action within our communities, and the risk of human rights adverse impacts within our supply chain. We implement our commitment to human rights through: (1) applying policies and processes described in this Policy; and (2) maintaining oversight and governance through the periodic review of this policy by GCE’s Nominating and Corporate Governance Committee.

This policy commitment applies to:

- All Company employees in all aspects of their employment relationship with the Company regardless of their position or seniority;
- All persons participating in or accessing Company sponsored programs, activities, or facilities;
- Suppliers, vendors, contractors, visitors, customers, partner institution students or anyone else who comes in contact with Company employees while they are engaged in GCE business.

PURPOSE

This Policy emphasizes the commitment that GCE has toward basic human rights and is an essential element of how GCE conducts its business and interacts with employees. This Policy provides direction for employees on the processes and practices that contribute to sustaining basic human rights in the workplace. The Policy supports employees in forming and preserving a work culture that protects the equal human rights of all persons.

The Company may, at any time, in its sole discretion, change or modify from anything stated in this policy, with or without notice. Nothing contained in any policy, procedure or work rule of the Company shall affect the “at will” status of any employee. Further nothing in this or any other policy, procedure or work rule of the Company is intended, or should be considered, as a contract or promise of employment.

CORE VALUES

The Company shares the common goal of each partner institution 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. The Company provides innovative educational learning solutions that promote student success and institutional growth in accordance with the guiding principles and ideals of the Christian faith. 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. The Company and all employees have the responsibility to work together for the common good of the community and its residents. The Company and employees must behave in a manner that is both ethically responsible and accountable at all times in upholding the public's interest.

PRINCIPALS OF OUR ETHICAL BUSINESS PRACTICE

- Respect the lives, rights, privacy, and property of others;
- We are motivated to maintain a positive work environment that encourages open and direct communication between all parties. We favor open communication as it allows employees to effectively work together and resolve any differences. Further information regarding the Company's Open-Door Policy can be found in the Employee Handbook.
- Avoid all conflicts of interest in decisions that we determine or influence as outlined in the [Supplier Gift Policy](#) and the Conflict of Interest policy in the Employee Handbook;
- Disclose any conflicts or potential conflicts of interest to any Company manager, the Chief Executive Officer, Chief Financial Officer, or Legal Department or by contacting the Company's third-party Compliance Hotline;
- 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;
- Use resources, material, and energy as efficiently and responsibly as possible in the provision of products and services;
- 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 in a manner that will withstand public scrutiny;
- Provide timely, full, and true disclosure of material information, both financial and non-financial, concerning the business and affairs of the Company to the public; and
- Comply with applicable laws and Company policies and procedures.

EMPLOYMENT STANDARDS

The Company will employ employees who are, in all cases, present voluntarily, not put at unnecessary risk of physical harm due to their work environment, and fairly compensated.

We will not allow the use of 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. The use of corporal punishment or other forms of mental or physical coercion is prohibited. No one under the age of 15, or the legal age of employment in any jurisdiction (whichever is higher), may be permitted to work for GCE. In addition to this, no minor may be employed to perform hazardous work, and any employment that surrounds minors is subject to any possible legal limitations, concerning working hours, wages, working conditions, and the minimal requirement of education.

The Company will at a minimum, provide wages and benefits that comply with all applicable laws. GCE will pay employees and provide workers with clear, written accounting of hours worked, deductions, and regular and overtime wages in a language they can understand. The foregoing is covered in GCE's Employee Handbook which is located in the Policy Center on GCE's Intranet.

ACCESSIBILITY

The Company 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. The Company shall require all applicable personnel to fulfill accessibility training requirements.

ANTI-HARASSMENT AND NON-DISCRIMINATION

The Company, while reserving its lawful rights where appropriate to take actions designed to ensure and promote the Christian principles that sustain its mission and heritage, prohibits unlawful discrimination, including any form of harassment and/or retaliation, by employees, customers, contractors, or agents of the Company and by anyone participating in a Company sponsored activity against an individual based on age, disability, national origin, race, ethnicity, color, religion, sex, pregnancy, veteran status, genetic information, or any other classification protected by applicable law. It is the purpose of the Company to pursue the very highest employment and academic standards within a context that celebrates and extends the spiritual and ethical ideals of the Christian faith. All employees are responsible for taking proper action to end those behaviors described herein.

We strongly prohibit discrimination against employees in any process. This includes hiring processes, performance evaluations, promotions, salary, or any other term or condition that relates to work. Discrimination on the basis of age, disability, national origin, race, ethnicity, color, religion, sex, pregnancy, veteran status, genetic information, or any other classification is prohibited by applicable law.

GCE believes and adheres to the fact that every employee deserves to be treated with dignity, fairness, honesty, and respect. It is within our expectations that all employees treat each other with decency and respect. Under no circumstances should any employee be subject to abuse, including verbal, physical, sexual, emotional or psychological, harassment, intimidation, or bullying. Any forms of violence in the workplace, including those listed herein, will not be tolerated.

Further information can be found in the Company's Code of Conduct and Nondiscrimination and Anti-Harassment Policies, located in Employee Handbook which is on the Company's Intranet Policy Center.

EMPLOYEE PROTECTION AND RIGHTS

At GCE, we are committed to ensuring the equal dignity of all employees and student workers, including those of minority groups and women. The company upholds the rights of women and all minority groups, ensuring their protection and well-being. We also firmly believe in the right to water as a fundamental human right, and we are dedicated to providing safe and clean water access for all employees. All of the security personnel who provide services for GCE respect human rights and adhere to this policy and all other GCE policies that encapsulate the protection of employees. By prioritizing these key areas, we aim to create a society that celebrates diversity, empowers women, and guarantees the necessities for a dignified life, including the essential resource of water.

DIVERSITY AND INCLUSION PRACTICES

GCE is a faith-friendly shared services provider that embraces a worldview which outlines a responsibility to both charity and stewardship which simply stated is, 'to love others as yourself'. We are a community of people who value the pursuit of truth and find great understanding in the convergence of differing viewpoints, backgrounds and ideas.

We welcome employees from all walks of life which has contributed to a growing diversity within our population. Our diversity encompasses a multitude of dimensions, including age, disability, national origin, race, color, religion, gender, veteran status and more. Our Christian perspective compels us to treat every individual equally with respect and compassion. All community members deserve a comfortable space to express their feelings, so that every voice is heard. All members of the Company will be welcomed, valued, and provided safety in this community.

Finally, diversity not only enriches the workplace and the educational endeavors of our partners, but it is also critical to it. Maintaining a diverse environment requires a measure of tolerance and understanding commensurate with the dignity and value of all human life. In sum, GCE values diversity because it values every employee and student entrusted to its care.

HEALTH AND SAFETY OF EMPLOYEES

We strive to provide a safe and healthy workplace that maintains working conditions that directly comply with applicable laws and regulations. The Company will:

- Provide its employees with safe and healthy work environments which, as a minimum standard, is in compliance with Arizona 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 industry-appropriate health and safety training;

- Ensure that all equipment and tools, including personal protective equipment are in proper working condition, maintained and certified; and
- Ensure workers are free to express their concerns about workplace conditions without fear of retribution of losing their jobs.
- GCE provides employees with the access to clean water at all office locations.

SMOKING IN THE WORKPLACE

As part of the Company's ongoing commitment to provide a safe and healthy environment, smoking and tobacco use is limited to designated areas only. Smoking and tobacco use is prohibited in all Company owned vehicles and any vehicle parked on Company property. The advertising, sale, or free sampling of tobacco products is also prohibited on Company property. Littering the remains of tobacco products or any other related waste product on Company property is further prohibited.

For the purposes of this policy, "smoking and tobacco" means lighting or burning any type of matter or substance that contains tobacco, including but not limited to cigars, cigarettes, pipes, chewing tobacco, smokeless tobacco; lighting or burning of non-tobacco plants or marijuana; and using electronic smoking devices. Company property means any property owned, leased, occupied, operated or otherwise controlled by Grand Canyon Education. In fairness to all employees, individuals who smoke are expected to comply with department practices regarding break time and designated smoking areas. For additional details, please see the full Smoking and Tobacco Use Policy posted in the Policy Center on GCE's intranet.

OFF-DUTY ACTIVITIES FOR EMPLOYEES

GCE recognizes and respects the right that employees have to engage in activities of their choosing when they are not working. Employees have freedom of association to engage in outside activities on their own behalf, of their own choosing, but these activities may not interfere with their job duties or responsibilities. Further, these activities shall remain separate from Company business and employees should be aware of how their behavior outside of work may reflect on the Company's reputation. See the Company's Social Media Use Policy and Employee Conduct Policy in the Employee Handbook and on the Company's intranet Policy Center.

STAKEHOLDERS

The Company takes its commitment to stakeholder involvement very seriously. We are committed to engaging with all of our stakeholders, including our employees, clients, customers, partners, and suppliers, honestly and fairly. We agree to honor our contractual commitments and abide by the letter and spirit of our business arrangements. We will protect and respect the confidentiality of personal information of all stakeholders, including employees, beneficiaries, consumers, vendors, and partner institutions. All employees must comply with Company policies and processes intended to ensure compliance with all relevant privacy and data protection laws.

COMPLIANCE

The Company's success is structured upon the integrity and high moral code of those employed within GCE. Our ethics and compliance, based around our human rights and labor rights policies, places dependence on having high ethical standards in all of the operations that we conduct throughout the United States. We comply with all relevant and applicable laws and regulations wherever we do business and expect our employees to follow suit. While we do not expect all employees to be experts of law, we believe they should be knowledgeable of the laws that apply to their specific areas of responsibility. It is commonly understood that all employees will obey all legal requirements and should seek the advice of the company's legal department when questions arise surrounding these subjects.

GOVERNANCE AND OVERSIGHT

The Company's Nominating and Corporate Governance Committee members will periodically review the Human and Labor Rights Policy and make any necessary recommendations.

GRIEVANCE MECHANISM

Any concerns regarding the administration or practice of this policy should be reported to the GCE Whistleblower Hotline.