



Harassment and Discrimination

Revised: December 4, 2023

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Purpose

It is the policy of Huron Consulting Group (Huron) to maintain a safe and professional work environment free of harassment and discrimination for all of its employees, job applicants, and other personnel conducting Huron business.

Coverage

This policy prohibits harassing or discriminatory conduct by any employee of Huron, including supervisors, managers and nonsupervisory employees. This policy also protects employees, job applicants and other personnel conducting Huron business from prohibited harassment. If harassment occurs in the workplace by someone not employed by Huron, the procedures in this policy should be followed.

Overview

Huron Consulting Group strictly prohibits all forms of discrimination and harassment (including sexual harassment) of any employee based upon that person's race, color, creed, religion, national origin, sex, marital status, genetic information, pregnancy, disability, sexual orientation, veteran status, age, FMLA status, physical or mental disabilities, gender identity, gender expression or any other basis protected by federal, state or local statute, ordinance or regulation. Huron Consulting Group is committed to the prevention of any and all impermissible discrimination and harassment. All members of management and other employees are protected by this policy and responsible for ensuring that harassment in violation of this policy does not occur.

General Policy Statement

In accordance with this policy, all personnel policies and decisions pertaining to hire, promotion, transfer, layoff, termination, training, rates of pay or other terms and conditions of employment are made and executed without regard to any legally protected status. Furthermore, Huron Consulting Group will not tolerate harassment based on any legally protected status.

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Conduct that disregards or violates this policy will not be tolerated from any person, whether the person is a management employee, non-management employee or non-employee. Any Huron employee who violates this policy will be subject to appropriate disciplinary action, up to and including termination at Huron's sole discretion.

Definition of Harassment

Harassment includes slurs or epithets, name-calling, jokes, cartoons, pictures, gestures, unwelcome physical touching, and other conduct or communication based on a person's race, color, creed, religion, national origin, sex, marital status, pregnancy, disability, sexual orientation, veteran status, age, FMLA status, gender identity, gender expression or any other basis protected by federal, state or local statute, ordinance or regulation.

Harassment can occur between an employee and a non-employee, such as a client, customer, or supplier.

Sexual harassment is a form of sex discrimination and is unlawful under federal, state, and where applicable local law.

Sexual harassment consists of unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, or written, graphic, or visual material of a sexual nature.

Huron Consulting Group considers the following conduct to constitute sexual harassment:

- Conditioning any aspect of employment on an employee's response to sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature, or written, graphic, or visual material of a sexual nature;
- Creating an intimidating, hostile, or offensive working environment or interfering with work performance by sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature, or written, graphic, or visual material of a sexual nature; or
- Conduct which unreasonably interferes with or is intended to interfere with an employee's work, or which creates a hostile, offensive, intimidating or humiliating atmosphere.

Huron also prohibits the use of its computers, e-mail system, voicemail system, cell and video phones, social media channels and any other electronic media in ways which could reasonably be perceived as offensive to others, are otherwise harassing or obscene, or for any other purpose which is illegal, against Huron policy, or not in the best interest of Huron. For example, the display or transmission of sexually explicit images, jokes, messages, and cartoons by electronic means is prohibited.

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Sexual Harassment

The following is a non-exclusive list of conduct that may constitute or contribute to sexual harassment and are prohibited under this policy:

- Sexual remarks, jokes, or other sexual conduct that interferes with another person's work performance or creates an intimidating, hostile or offensive work environment;
- Display of sexual, sexually suggestive, or discriminatory objects or pictures;
- Personnel decisions by supervisors regarding promotions, raises or scheduling based on an individual's submission to or rejection of sexual advances;
- Requests for sexual favors used as a condition of keeping or getting a job, a promotion or other job benefit, whether expressed in explicit or implicit terms;
- Unwanted sexual advances or propositions, whether verbal, written or otherwise;
- Offering employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons or posters;
- Making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about an individual's body or dress;
- Written communications of a sexual nature distributed in hard copy or via a computer network, email, text, instant messaging or on a social media platform;
- Harassing or discriminatory comments are always wrong – whether on the job, outside of the workplace or online.
- Sexually oriented gestures, noises, remarks or jokes, or comments about a person's sexuality or sexual experience, which create a hostile work environment;
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, suggestive or obscene letters, message, posts, notes, pictures, or invitations;
- Hostile actions taken or remarks made (whether verbally or in writing) against an individual, community or group based on sex, sexual orientation, gender identity or the status of being transgender;
- Physical conduct, including inappropriate touching, pinching, patting, kissing, grabbing, impeding or blocking movements, brushing up against another's body, assault or attempts to commit assault.

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These behaviors are unacceptable both in the workplace and in any work-related setting outside the workplace such as during business trips, business meetings, business-related social events or Huron-sponsored events or when using Huron computers, e-mail system, instant messaging, videoconferencing, business communication platform, voicemail system, cell and video phones, social media channels and any other electronic media.

Sexual harassment can occur between any individuals, regardless of their sex or gender. Sexual harassment on the job is unlawful whether it involves coworker harassment, harassment by a supervisor or manager, or by persons, including customers, clients or vendors, doing business with or for Huron.

Manager's Responsibilities

All supervisors and managers are responsible for:

- Implementing this policy, which includes, but is not limited to, taking steps to prevent harassment and retaliation;
- Ensuring that all employees under their supervision have knowledge of and understand this policy;
- Immediately reporting any complaints to a representative in the Human Resources or Legal Departments so that the complaint may be reviewed or investigated and resolved in a timely manner;
- Acting in accordance with the company's values and Leadership Principles when they become aware or reasonably should be aware of conduct that violates this policy;
- Taking and/or assisting in prompt and appropriate corrective action when necessary to ensure compliance with this policy; and
- Conducting themselves, at all times, in a manner consistent with this policy.

Internal Complaint Procedure

Huron Consulting Group has adopted an internal reporting process in order to assist it in fulfilling its commitment to preventing discrimination and harassment.

All employees are required to report any observed harassment or discrimination.

Any individual who (1) believes that they have been subjected to harassment or other discriminatory treatment, or (2) believes that they have witnessed harassment or other discriminatory treatment, or (3) becomes aware of such treatment must bring

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this to the attention of the employee's supervisor or Managing Director or a representative of the Human Resources or Legal department. Reports of incidents or potential violations may be made verbally or in writing and should be reported immediately. *Huron's Helpline* (1-800-690-8135) may also be used to anonymously report harassment or discriminatory treatment.

Investigation, Disciplinary Action and Confidentiality

All reports and complaints of harassment, discrimination and retaliation will be reviewed and/or investigated thoroughly, promptly, impartially, and discreetly. The facts of each case will determine the nature and scope of the investigation and response to the conduct at issue. Appropriate disciplinary action, up to and including termination, will be taken if it is determined that an employee has violated Huron's policy on harassment and discrimination. Any failure to fully cooperate could lead to disciplinary action up to and including termination of employment.

All information regarding any specific incident will be kept confidential within the necessary boundaries of the fact-finding process. Individuals who are involved in the complaint reporting and investigation process will be instructed to maintain confidentiality.

Confidentiality does not mean that the details of the complaint will be withheld from the charged party, or that Huron Consulting Group is constrained from divulging the outcome in appropriate circumstances. It does mean that Huron will take all reasonable measures to ensure that the situation is divulged only to those with a need to know.

All persons involved in an investigation, including the person making the report or complaint, witnesses and alleged harassers will be accorded a fair process.

Upon receipt of a complaint, the Vice President of Human Resources or the Chief Compliance Officer, or their designees, will (1) conduct a review of the allegations; (2) take steps to obtain documents, emails or phone records that may be relevant to an investigation; (3) interview all parties involved including any relevant witnesses; (4) create written documentation of the investigation; (5) follow-up with the individual who reported and the subject of the complaint as appropriate; and (6) implement any corrective action.

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Prohibition Against Retaliation

Huron Consulting Group strictly prohibits retaliation against any person for making a complaint of harassment, reporting or opposing harassment, encouraging a fellow employee to report harassment, or for filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by Huron or a governmental enforcement agency. Retaliation is unlawful under federal, state and where applicable, local law.

Unlawful retaliation can be any action that could discourage an individual from coming forward to make or support a sexual harassment or discrimination claim. Prohibited retaliation includes, but is not limited to:

- termination;
- demotion;
- suspension;
- failure to hire or consider for hire;
- failure to give equal consideration in making employment decisions;
- failure to make employment recommendations impartially;
- threats of violence; or
- adversely affecting working conditions or otherwise denying any employment benefit.

Even if the alleged harassment does not turn out to rise to the level of a violation of law or Huron policy, individuals are protected from retaliation if the person had a good faith belief that the practices were unlawful or in conflict with Huron's policies. However, this retaliation provision is not intended to protect persons making intentionally false charges of harassment.

If any employee believes that they have been subjected to retaliation for having brought or supported a complaint of harassment, they should immediately notify a member of Huron's Human Resources Department or Legal Department, or Huron's Helpline, so that the reported actions can be reviewed and investigated. Any report of retaliatory conduct will be objectively, timely and thoroughly addressed. Any individual who has been found to engage in such retaliation against another employee will be subject to appropriate corrective or disciplinary action up to and including termination.

For further information, employees should review Huron's Non-Retaliation Policy and FAQs, which describe what constitutes retaliation and how reports will be investigated.

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Complaints to Outside Agencies

The Equal Employment Opportunity Commission ("EEOC") and equivalent state agencies will accept and investigate charges of unlawful discrimination and harassment at no charge to the complaining party. The nearest office of the EEOC and equivalent state agencies can be found in your local telephone directory or online at www.eeoc.gov.

An employee who has been physically harassed or threatened while on the job may also have grounds for criminal charges of assault and battery. In those circumstances employees may wish to contact the local police department.

Violation of Policy

Appropriate disciplinary action, up to and including termination, will be taken if it is determined that an employee has violated Huron's policy on harassment and discrimination.

Huron does not consider conduct in violation of this policy to be within the course and scope of employment or the direct consequence of the discharge of one's duties.

Accordingly, to the extent permitted by law, Huron reserves the right not to provide a defense or pay damages assessed against an employee for conduct in violation of this policy. Hence, any individuals engaging in conduct in violation of this policy may be personally liable in any legal action brought by any person who is the victim of such conduct.

Related Policies

Equal Employment Opportunity and Affirmative Action
Non-Retaliation Policy
Social Media Policy

State and Local Supplemental Information

New York: for employees working in New York, click here for additional information: [Legal Protections and External Remedies](#) and [Complaint Form](#)

Chicago: for employees working in Chicago, click here for additional information: [Supplemental Chicago Sexual Harassment](#)
