



Hult International Business School

Sexual Harassment and Title IX Policy

Academic Year 2025-2026

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Sexual Misconduct and Title IX Policy

Hult International Business School is committed to providing an educational and employment environment that is free from sex discrimination, sex-based harassment, and retaliation for engaging in protected activity. The institution values and upholds the equal dignity of all members of its community and strives to balance the rights of the Parties in the resolution process during what is often a difficult time for all involved.

Title IX of the U.S. Education Amendments of 1972 (“Title IX”) is a federal civil rights law that prohibits discrimination based on sex in education programs and activities. In the United Kingdom, The Equality Act 2010 and the Protection from Harassment Act 1997, along with the Office of Students Condition E6, prohibit harassment and inform higher education providers on the steps to prevent and address harassment and sexual misconduct. Hult International Business School (“Hult”) does not discriminate based on sex in the education programs or activities that it operates including admissions and employment and is committed to preventing and addressing harassment or misconduct when it occurs.

Hult seeks to comply with all federal, state, and local laws, regulations, and ordinances prohibiting sex discrimination in post-secondary education institutions. This is inclusive of pregnancy status.

Under Title IX, discrimination based on sex can also include sexual harassment which is defined as conduct based on sex that satisfies one or more of the following:

1. An employee of Hult conditioning the provision of education benefits on participation in unwelcome sexual conduct (i.e., quid pro quo); or
2. Unwelcome conduct that a reasonable person would determine is so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the institution’s education program or activity; or
3. An incident or incidents of sexual assault, dating violence, domestic violence, or stalking as defined by the Hult Sexual Harassment Policy which takes place on one of the Hult campuses, or at an event or program controlled or managed by Hult.

Sexual misconduct is defined as any unwanted or attempted unwanted conduct of a sexual nature. This includes, but is not limited to:

- sexual harassment
- sexual assault
- rape

Inclusion Related to Gender Identity/Expression

Hult strives to ensure that all individuals are safe, included, and respected in their education and employment environments, regardless of their gender identity or expression, including intersex, nonbinary, transgender, agender, two-spirit, and gender-diverse students and employees.

Discrimination and harassment based on gender identity or expression are not tolerated by Hult. If a member of the community believes they have been subjected to discrimination under this Policy, they should follow the appropriate reporting process described herein.

In upholding the principles of equity and inclusion, the school supports the full integration and healthy development of those who are gender diverse and seeks to eliminate any stigma related to gender identity and expression.

As our society’s understanding of gender evolves, so do the Hult’s processes and policies. Concepts like

misgendering and deadnaming may not be familiar to all but understanding them is essential to the school's goal of being as welcoming and inclusive a community as possible.

This Policy should be interpreted consistent with the goals of maximizing the inclusion of intersex, transgender, transitioning, agender, nonbinary, and gender-diverse students and employees, including:

- Maintaining the privacy of all individuals consistent with law
- Ensuring all students have equal access to educational programming, activities, and facilities, including restrooms and locker rooms
- Ensuring all employees have equal access to employment opportunities and work, service, or health-related facilities
- Providing professional development for employees and education for students on topics related to gender inclusion
- Encouraging all students and employees to respect the pronoun usage and identities of all members of the community

Hult uses several interventions to address concerns that are raised related to gender-based harassment or discrimination, including problem-solving, intervention, confrontation, investigation, and Policy enforcement. When conflicts arise between the right of members of the community to be free from gender-identity discrimination and those exercising their right to religious freedom, the school will try to balance rights and interests to find mutually agreeable outcomes or compromises. When that is not possible, Hult will offer remedial solutions or enforce its Policies while also respecting the rights of all members of its community.

Academic Freedom and Freedom of Speech

Freedom of Speech and Academic Freedom (UK Campus)

In the UK, Hult implements this policy in a manner consistent with the freedom of speech principles set out in OfS Condition E6. There is a rebuttable presumption that exposure to course materials, academic debate, or statements made as part of teaching, research, or discussion about any subject matter connected with the content of a higher education course are unlikely to constitute harassment, unless such conduct meets the legal threshold for harassment under the Equality Act 2010 or the Protection from Harassment Act 1997.

This policy does not restrict lawful speech, academic freedom, or the expression of controversial views in an educational context, except where such speech or conduct meets the statutory definition of harassment or sexual misconduct

Reporting

Any person may report sexual misconduct or sex discrimination, including sexual harassment (whether or not the person reporting is the person alleged to be impacted by conduct that could constitute sex discrimination or sexual harassment), in person, by mail, by telephone, or by electronic mail, using the contact information listed for the Title IX Coordinator, or by any other means that results in the Title IX Coordinator receiving the person's verbal or written report.

Such a report may be made at any time (including during non-business hours) by using the telephone number, electronic mail address, or by mail to the office address listed for the Title IX Coordinator. Hult will also accept anonymous complaints or reports, but Hult may have limited ability to respond to the behavior if only limited

information is provided. The following person has been designated to handle inquiries regarding this policy:

Title IX Coordinator
Patrick Heaton
1 Education St.
Cambridge, MA 02141
patrick.heaton@hult.edu

Certain responsibilities assigned to the Title IX Coordinator under this policy may be carried out by a trained designee, but the Title IX Coordinator retains overall responsibility and oversight for compliance with this policy.

Hult recognizes that allegations under this Policy may include multiple forms of sexual misconduct, sex discrimination and sex-based harassment, as well as violations of other Hult policies; may involve various combinations of students, employees, and other members of the Hult community; and may require the simultaneous attention of multiple Hult departments. Accordingly, all Hult departments will share information, combine efforts, and otherwise collaborate, to the maximum extent permitted by law and consistent with other applicable Hult policies, to provide uniform, consistent, efficient, and effective responses to alleged sex discrimination, sexual misconduct, sex-based harassment, or retaliation.

Jurisdiction of the Policy

This Policy applies to Hult's education programs and activities (defined as including locations, events, or circumstances in which the Hult exercises substantial control over both the Respondent and the context in which the conduct occurred), circumstances where the Hult has disciplinary authority, and to misconduct occurring within any building owned or controlled by Hult or an associated party regardless of location. This policy may also apply to the effects of off-campus misconduct that limit or deny a person's access to Hult's education program or activities and/or to online conduct when the conduct affects a substantial recipient interest. A substantial recipient interest includes:

1. Any action that constitutes a criminal offense as defined by law. This includes, but is not limited to, single or repeat violations of any local, state, or federal law.
2. Any situation in which it is determined that the Respondent poses an imminent and serious threat to the health or safety of any student, employee, or other individual.
3. Any situation that significantly impinges upon the rights, property, or achievements of others, significantly breaches the peace, and/or causes social disorder.
4. Any situation that substantially interferes with the Recipient's educational interests or mission.

Where local law or regulation imposes additional or different requirements, those requirements may take precedence as required for the relevant campus.

For disciplinary action to be issued under this Policy, the Respondent must be a Hult faculty member, student, or employee at the time of the alleged incident. If the Respondent is unknown or is not a member of the Hult community, the Hult will offer to assist the Complainant in identifying appropriate institutional and local resources and support options and will implement appropriate supportive measures and/or remedial actions (e.g., trespassing a person from campus). Hult can also assist in contacting local or institutional law enforcement if the individual would like to file a police report about criminal conduct.

All vendors serving Hult through third-party contracts are subject to the policies and procedures of their employers and/or to these policies and procedures to which their employer has agreed to be bound by their contracts.

When the Respondent is enrolled in or employed by another institution, Hult can assist the Complainant in contacting the appropriate individual at that institution, as it may be possible to pursue action under that

institution's policies.

Similarly, Hult may be able to assist and support a student or employee Complainant who experiences sex discrimination or sex-based harassment in an externship, study abroad program, or other environment external to Hult where sexual harassment or nondiscrimination policies and procedures of the facilitating or host organization may give the Complainant recourse. If there are effects of that external conduct that impact a student or employee's work or educational environment, those effects can often be addressed remedially by the Hult if brought to the school's attention.

Supportive Measures

Hult will offer and implement appropriate and reasonable supportive measures to all parties upon notice of alleged sexual harassment and/or retaliation.

Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the parties to restore or preserve access to Hult's education program or activity, including measures designed to protect the safety of all parties or Hult's educational environment, and/or deter sexual harassment and/or retaliation.

The Title IX Coordinator promptly makes supportive measures available to the parties upon receiving notice or a complaint. At the time that supportive measures are offered, Hult will inform the Complainant, in writing, that they may file a formal complaint with Hult either at that time or in the future, if they have not done so already.

The Title IX Coordinator works with the parties to ensure that their wishes are considered with respect to the supportive measures that are planned and implemented.

Hult will maintain the privacy of the supportive measures if privacy does not impair Hult's ability to provide the supportive measures, implement the requirements of this any other policy or otherwise conflict with Hult's obligations as a higher education institution. Hult will act to ensure as minimal an academic/occupational impact on the parties as possible.

Hult will implement measures in a way that does not unreasonably burden either party. This action may include, but are not limited to:

- Referral to counseling, medical, and/or other healthcare services
- Referral to the Employee Assistance Program
- Referral to community-based service providers
- Student financial aid counseling
- Altering campus housing assignment(s)
- Altering work arrangements for employees or student-employees
- Safety planning
- Providing transportation accommodations
- Implementing mutual no contact orders between the parties
- Academic support, extensions of deadlines, or other course/program-related adjustments
- Class schedule modifications, withdrawals, or leaves of absence
- Increased security and monitoring of certain areas of the campus
- Pregnancy-related accommodation including but not limited to breastfeeding accommodations or other reasonable accommodations of support
- Any other actions deemed appropriate by the Title IX Coordinator

Violations of no contact orders will be referred to appropriate student or employee conduct processes for enforcement.

The Parties are provided with a timely opportunity to seek modification or reversal of Hult's decision to provide, deny, modify, or terminate supportive measures applicable to them. A request to do so should be made in writing to the Title IX Coordinator. An impartial employee other than the employee who implemented the supportive measures, who has authority to modify or reverse the decision, will determine whether to provide, deny, modify, or terminate the supportive measures if they are inconsistent with legal requirements or this Policy. Hult will also provide the Parties with the opportunity to seek additional modification or termination of supportive measures applicable to them if circumstances materially change. Hult typically renders decisions on supportive measures within seven (7) business days of receiving a request and provides a written determination to the impacted party(ies).

Confidential Resources

The confidential resource available at Hult are the licensed on-campus counselors. Conversations with confidential resources are kept strictly confidential and, except in rare, extreme circumstances (including imminent risk of harm to self or others), nothing will be shared without your permission.

Immediate Action and Emergency Removal

Hult can act to remove a Respondent entirely or partially from its education program or activities on an emergency basis when an individualized safety and risk analysis has determined that an immediate threat to the physical health or safety of any student or other individual justifies removal. This risk analysis is performed by the Title IX Coordinator in conjunction with the campus management and Campus Emergency Team.

In all cases in which an emergency removal is imposed, the student, or employee will be given notice of the action and the option to request to meet with the Title IX Coordinator prior to such action/removal being imposed, or as soon thereafter as reasonably possible, to appeal the action/removal should not be implemented or should be modified.

This meeting is not a hearing on the merits of the allegation(s), but rather is an administrative process intended to determine solely whether the emergency removal is appropriate. When this meeting is not requested in a timely manner objection to the emergency removal will be deemed waived. A Complainant and their Advisor may be permitted to participate in this meeting.

A Respondent may be accompanied by an Advisor of their choice when meeting with the Title IX Coordinator for the show cause meeting. The Respondent will be given access to a written summary of the basis for the emergency removal prior to the meeting to allow for adequate preparation.

The Title IX Coordinator has sole discretion under this policy to implement or stay an emergency removal and to determine the conditions and duration. Violation of an emergency removal under this policy will be grounds for sanction, which may include dismissal or termination, independent of the original or underlying Title IX complaint.

Hult will implement the least restrictive emergency actions possible in light of the circumstances and safety concerns. As determined by the Title IX Coordinator, these actions could include, but are not limited to: removing a student from a residence hall, temporarily re-assigning an employee, restricting a student's or employee's access to or use of facilities or equipment, allowing a student to withdraw or take grades of incomplete without financial penalty, authorizing an administrative leave, and suspending a student's participation in extracurricular activities, student employment, student organizational leadership, or student clubs or intramural athletics.

At the discretion of the Title IX Coordinator, alternative coursework options may be pursued to ensure as minimal an academic impact as possible on the parties.

Promptness

All allegations are acted upon promptly once Hult has received notice or a formal complaint. Complaints can take 60-90 business days to resolve, typically. There are always exceptions and extenuating circumstances that can cause a resolution to take longer, but Hult will avoid all undue delays within its control.

Any time the general timeframes for resolution outlined in Hult's policy will be unduly delayed, Hult will provide written notice to the parties of the delay, the cause of the delay, and an estimate of the anticipated additional time that will be needed because of the delay.

Hult may undertake a short delay in its investigation (several days to a few weeks) if circumstances require. Such circumstances include but are not limited to a request from law enforcement to temporarily delay the investigation, the need for language assistance, the absence of parties and/or witnesses, and/or accommodations for disabilities or health conditions.

Hult will communicate in writing the anticipated duration of the delay and reason to the parties and provide the parties with status updates if necessary. Hult will promptly resume its investigation and resolution process as soon as feasible. During such a delay, Hult will implement supportive measures as deemed appropriate.

Hult action(s) are not typically altered or precluded on the grounds that civil or criminal charges involving the underlying incident(s) have been filed or that criminal charges have been dismissed or reduced.

Reporter or Complainant Requests No Investigation

If a Reporter or Complainant requests that an investigation not be conducted, the Title IX Coordinator will consider the reasons for the request, including concerns about continued safety of the person reportedly harmed and members of the campus community.

The Title IX Coordinator must also balance considerations about the continued health and safety of members of the community against a Reporter's or Complainant's desire not to have the report investigated. In cases when a Reporter or Complainant does not want to have a report investigated, but the Title IX Coordinator is concerned that not taking formal or informal action might endanger the health or safety of members of the campus community, the Title IX Coordinator will initiate confidential consultation with appropriate individuals to analyze the situation and assist in determining appropriate measures to take.

The Title IX Coordinator will make the ultimate decision about whether to conduct a formal investigation.

Hult's ability to remedy and respond to notice may be limited if the Complainant does not want Hult to proceed with an investigation and/or grievance process. The goal is to provide the Complainant with as much control over the process as possible, while balancing Hult's obligation to protect its community.

In cases in which the Complainant requests confidentiality/no formal action and the circumstances allow Hult to honor that request, Hult will offer supportive measures and remedies to the Complainant and the community, but will not otherwise pursue formal action. If the Complainant elects to take no action, they can change that decision if they decide to pursue a formal complaint later.

Federal Timely Warning Notification and Statistical Reporting

Parties reporting sexual assault, domestic violence, dating violence, and/or stalking should be aware that under the Clery Act, Hult must issue timely warnings for incidents reported to them that pose a serious or continuing threat

of bodily harm or danger to members of the campus community.

Hult will ensure that a Complainant's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions considering the potential danger.

Amnesty

Hult encourages the reporting of misconduct and crimes by Complainants and witnesses. Sometimes, Complainants or witnesses are hesitant to give notice or participate in resolution processes because they fear that they themselves may be in violation of certain policies, such as underage drinking or use of illicit drugs at the time of the incident. Respondents may hesitate to be forthcoming during the process for the same reasons.

It is in the best interests of the school community that Complainants choose to give notice of suspected misconduct to Hult officials, that witnesses come forward to share what they know, and that all Parties be forthcoming during the process.

To encourage reporting and participation in the process, Hult offers amnesty from minor policy violations, such as underage alcohol consumption or the use of illicit drugs, related to the incident. Granting amnesty is a discretionary decision made by the school, and amnesty does not apply to more serious allegations, such as physical abuse, sexual misconduct, or illicit drug distribution.

Initial Assessment

Upon receipt of a complaint or notice to the Title IX Coordinator of an alleged violation of the Policy, Hult initiates a prompt initial assessment to determine the next steps Hult needs to take.

The formal grievance process will determine whether the Policy has been violated. If so, Hult will promptly implement effective remedies designed to ensure that it is not deliberately indifferent to harassment or discrimination, their potential recurrence, or their effects.

The steps in an initial assessment can include:

- If notice is given, the Title IX Coordinator seeks to determine if the person impacted wishes to make a formal complaint, and will assist them to do so, if desired.
- If they do not wish to do so, the Title IX Coordinator determines whether to initiate a complaint based on whether there is a compelling threat to health and/or safety.
- If a formal complaint is received, the Title IX Coordinator assesses it implicates the Policy. The Title IX Coordinator is not making value judgments. Rather, the assessment focuses on whether the conduct alleged, if proven beyond a preponderance of the evidence, would implicate Hult's policies.
- The Title IX Coordinator works with the Complainant to determine whether the Complainant prefers a supportive and remedial response, an informal resolution option, or a formal investigation and grievance process.
 - If a supportive and remedial response is preferred, the Title IX Coordinator works with the Complainant to identify their wishes and then seeks to facilitate implementation. No Formal Grievance Process is initiated, though the Complainant can elect to initiate one later, if desired
 - If an informal resolution option is preferred, the Title IX Coordinator assesses whether the complaint is suitable for informal resolution and may seek to determine if the Respondent is also willing to engage in informal resolution. Informal resolution is not appropriate or allowed in cases in which a student accuses an employee of sexual misconduct.
 - For Hult's San Francisco campus, California state law (SB 493) also prohibits the use of mediation, even voluntarily, for the resolution of allegations of sexual violence (i.e., sexual assault, dating violence, domestic violence, and stalking). In the UK, applicable law restricts the use of a non-disclosure agreement for student cases involving harassment or sexual

- misconduct.
- If a Formal Grievance Process is preferred, the Title IX Coordinator determines if the misconduct alleged falls within the scope of Title IX:
 - If it does, the Title IX Coordinator will initiate the formal investigation and grievance process.
 - If it does not, the Title IX Coordinator determines that Title IX does not apply (and will “dismiss” that aspect of the complaint, if any), assesses which aspects of this policy or other Hult policies may apply. Please note that dismissing a complaint under Title IX is just procedural and does not limit Hult’s authority to address a complaint with an appropriate process and remedies.

Upon any dismissal, Hult will promptly send written notice of the dismissal and the rationale for doing so simultaneously to the parties. This dismissal decision is appealable by any party under the procedures for appeal below.

Right to an Advisor

The parties may each have an Advisor of their choice present with them for all meetings and interviews within the resolution process if they so choose. The parties may select whomever they wish to serve as their Advisor as long as the Advisor is available. The Advisor may be a friend, mentor, family member, attorney, or any other individual a party chooses to advise, support, and/or consult with them throughout the resolution process. The parties may choose Advisors from inside or outside of Hult community. The only limitation is that the advisor cannot also be a witness or a party in the same matter being investigated to avoid undermining the investigative process.

Under Title IX an individual is required by law to have an advisor at the hearing portion of the process. If an individual does not have an advisor at that point, Hult will appoint an advisor, who may or may not be an attorney at Hult’s discretion, to facilitate questioning during the hearing. Hult is unable to provide advisors prior to the hearing process. To the extent that Hult provides an advisor, that individual will receive training on Hult’s process and the general role of advisor.

Advisors in Hearings

Under U.S. Department of Education regulations applicable to Title IX, cross-examination is required during the hearing but must be conducted by the parties’ Advisors. The parties are not permitted to directly cross-examine each other or any witnesses. If a party does not have an Advisor for a hearing, Hult will appoint a trained Advisor for the limited purpose of conducting any cross-examination.

A party may reject this appointment and choose their own Advisor, but they may not proceed during the hearing without an Advisor. The adjudicator at the hearing is also entitled to ask questions of any party or witness involved.

Advisor’s Role

The parties may be accompanied by their Advisor in all meetings and interviews at which the party is entitled to be present, including intake and interviews. Advisors should help the parties prepare for each meeting and are expected to advise ethically, with integrity, and in good faith.

Advisor Violations of Hult Policy

All Advisors are subject to the same Hult policies and procedures, whether they are attorneys or not. Advisors are expected to advise their advisees without disrupting proceedings. Advisors should not address Hult officials in a meeting or interview unless invited to (e.g., asking procedural questions). The Advisor may not make a

presentation or represent their advisee during any meeting or proceeding and may not speak on behalf of the advisee to the Investigator(s) or other Decision-maker except during a hearing proceeding, during cross-examination.

The parties are expected to ask and respond to questions on their own behalf throughout the investigation phase of the resolution process. Although the Advisor generally may not speak on behalf of their advisee, the Advisor may consult with their advisee, either privately as needed, or by conferring at a break in the process.

Any Advisor who oversteps their role as defined by this policy will be warned only once. If the Advisor continues to disrupt or otherwise fails to respect the limits of the Advisor role, the Advisor will be dismissed, and the meeting will be ended until a substitute Advisor is selected or appointed by Hult.

Sharing Information with the Advisor

Hult expects that the parties may wish to have Hult share documentation and evidence related to the allegations with their Advisors. Parties may share this information directly with their Advisor or other individuals if they wish. Doing so may help the parties participate more meaningfully in the resolution process.

Hult also provides a consent form that authorizes Hult to share such information directly with their Advisor. The parties must either complete and submit this form to the Title IX Coordinator or provide similar documentation demonstrating consent to a release of information to the Advisor before Hult is able to share records with an Advisor.

Privacy of Records Shared with Advisor

Advisors are expected to maintain the privacy of the records shared with them in accordance with applicable data privacy laws. These records may not be shared with third parties, disclosed publicly, or used for purposes not explicitly authorized by Hult. Hult may seek to restrict the role of any Advisor who does not respect the sensitive nature of the process or who fails to abide by Hult's privacy expectations.

Expectations of the Parties with Respect to Advisors

A party may elect to change Advisors during the process and is not obligated to use the same Advisor throughout. The parties are expected to provide timely notice to the Title IX Coordinator if they change Advisors at any time. It is assumed that if a party changes Advisors, consent to share information with the previous Advisor is terminated, and a release for the new Advisor must be secured.

Time Limits on Reporting

There is no time limitation on providing Notice/Complaints. However, if the Respondent is no longer subject to Hult's jurisdiction and/or significant time has passed, the ability to investigate, respond, and/or provide remedies may be more limited or impossible.

Acting on Notice/Complaints significantly impacted by the passage of time (including, but not limited to, the rescission or revision of Policy) is at the discretion of the school; allegations may be documented for future

reference, offer supportive measures and/or remedies, and/or engage in informal or formal action, as appropriate.

Notice/Complaint

Hult will act on any Notice, Complaint, or Knowledge of a potential violation of the policy that the coordinator or any other Mandated Reporter receives by applying the Resolution Process below. The procedures below apply to all allegations of sexual misconduct, discrimination based on sex, sex-based harassment, retaliation, or Other Prohibited Conduct involving students, employees, or third parties.

Resolution Processes

Resolution proceedings are private. All persons present at any time during the resolution process are expected to maintain the privacy of the proceedings in accordance with Hult policy. While there is an expectation of privacy around what Investigators share with parties during interviews, the parties have discretion to share their own knowledge and evidence with others if they so choose. Hult encourages parties to discuss this with their Advisors before doing so.

Initial Evaluation

The coordinator conducts an initial evaluation, after receiving Notice/Complaint/Knowledge of alleged misconduct. The initial evaluation typically includes:

- Assessing whether the reported conduct may reasonably constitute a violation of the Policy.
 - If the conduct may not reasonably constitute a violation of the Policy, the matter is typically dismissed from this process, consistent with the dismissal provision in these procedures. It may then be referred to another process, if applicable.
- Determining whether Hult has jurisdiction over the reported conduct, as defined in the Policy.
 - If the conduct is not within Hult jurisdiction, the matter is typically dismissed from this process, consistent with the dismissal provision in these procedures. If applicable, the conduct will be referred to the appropriate Hult office for resolution.
- Offering and coordinating supportive measures for the Complainant.
- Offering and coordinating supportive measures for the Respondent, as applicable.
- Notifying the Complainant, or the person who reported the allegation(s), of the available resolution options, including a supportive and remedial response, an Informal Resolution option, or the Resolution Process described below.
- Determining whether the Complainant wishes to initiate a Complaint.
- Notifying the Respondent of the available resolution options, including a supportive and remedial response, an Informal Resolution option, or the Resolution Process described below, if a Complaint is made.

Helping a Complainant to Understand Resolution Options

If the Complainant indicates they wish to initiate a Complaint (in a manner that can reasonably be construed as reflecting intent to make a Complaint), the coordinator will help to facilitate the Complaint, which will include working with the Complainant to determine whether the Complainant wishes to pursue one of three resolution options:

- a supportive and remedial response, and/or
- Informal Resolution, or
- Resolution options as described below.

Notice of Investigation and Allegations

The Title IX Coordinator will provide written notice of the investigation and allegations (the “NOIA”) to the Respondent upon commencement of the Formal Grievance Process. This facilitates the Respondent’s ability to prepare for the interview and to identify and choose an Advisor to accompany them. The NOIA is also copied to the Complainant, who is to be given advance notice of when the NOIA will be delivered to the Respondent.

The NOIA will include:

- A meaningful summary of all of allegations,
- The identity of the involved parties (if known),
- The specific policies implicated,
- A description of the applicable procedures,
- A statement about Hult’s policy on retaliation,
- Information about the privacy of the process,
- Information on the need for each party to have an Advisor of their choosing and suggestions for ways to identify an Advisor,
- A statement informing the parties that Hult’s Policy prohibits knowingly making false statements, including knowingly submitting false information during the resolution process,
- Detail on how the party may request disability accommodations during the interview process,

Amendments and updates to the NOIA may be made as the investigation progresses and more information becomes available regarding the addition or dismissal of various charges.

Investigation Process

All investigations are thorough, reliable, impartial, prompt, and fair. Investigations involve interviews with all relevant parties and witnesses; obtaining available, relevant evidence; and identifying sources of expert information, as necessary. All investigations under this policy involve at least two persons, the Title IX Coordinator, and local trained Staff.

All parties have a full and fair opportunity, through the investigation process, to suggest witnesses and questions, to provide evidence and expert witnesses, and to fully review and respond to all evidence on the record. All meetings, investigations and interviews will be recorded via Zoom and be available to all parties.

The Investigator(s) typically take(s) the following steps, if not already completed:

- Interview both parties and all available, relevant witnesses and conduct follow-up interviews as necessary
- Allow each party the opportunity to suggest witnesses and questions they wish the Investigator(s) to ask of the other party and witnesses, and document in the report which questions were asked, with a rationale for any changes or omissions.
- Provide each party an opportunity to review and verify the Investigator’s summary notes of the relevant evidence/testimony from their respective interviews and meetings
- Complete the investigation promptly and without unreasonable deviation from the intended timeline
- Provide regular status updates to the parties throughout the investigation.

The investigation does not consider incidents not directly related to the possible violation, unless they evidence a pattern; questions and evidence about the Complainant’s sexual predisposition or prior sexual behavior are also not allowed, unless such questions and evidence about the Complainant’s prior sexual behavior are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant, or if the questions and evidence concern specific incidents of the Complainant’s prior sexual behavior with respect to the Respondent and are offered to prove consent.

Draft Investigation Report

The Title IX Coordinator will write a comprehensive investigation report fully summarizing the investigation, all witness interviews, and addressing all relevant evidence. Appendices including relevant physical, or documentary evidence will be included.

This report will be provided to the parties and their respective Advisors (if so desired by the parties) as well as an opportunity to inspect and review all of the evidence obtained as part of the investigation that is directly related to the reported misconduct, for a ten (10) business day review and comment period so that each party may meaningfully respond to the evidence. The parties may elect to waive the full ten days.

Responses to the preliminary investigation report must be sent in writing to the Title IX coordinator before the close of the 10-day period. The Title IX coordinator will incorporate relevant elements of the parties' written responses into the final investigation report, include any additional relevant evidence, make any necessary revisions, and finalize the report. The Title IX Coordinator should document all rationales for any changes made after the review and comment period.

The final report is then shared with all parties and their Advisors through electronic transmission. The parties are also provided with a file of any directly related evidence that was not included in the report.

Informal Resolution

Informal Resolution can include three different approaches:

- When the parties agree to resolve the matter through an alternate resolution mechanism
- When the Respondent accepts responsibility for violating policy, and desires to accept a sanction and end the resolution process; or
- When the Title IX Coordinator can resolve the matter informally by providing supportive measures to remedy the situation.

To initiate Informal Resolution, a Complainant needs to submit a formal complaint, as defined above. If a Respondent wishes to initiate Informal Resolution, they should contact the Title IX Coordinator to so indicate.

It is not necessary to pursue Informal Resolution first to pursue a Formal Grievance Process, and any party participating in Informal Resolution can stop the process at any time and begin or resume the Formal Grievance Process.

Prior to implementing Informal Resolution, Hult will provide the parties with written notice of the reported misconduct and any sanctions or measures that may result from participating in such a process, including information regarding any records that will be maintained or shared by Hult.

Hult will obtain voluntary, written confirmation that all parties wish to resolve the matter through Informal Resolution before proceeding and will not pressure the parties to participate in Informal Resolution. There are several types of informal resolution that Hult will consider:

Alternate Resolution

Alternate Resolution is an informal process, such as mediation or restorative practices, by which a mutually agreed upon resolution of an allegation is reached. It may be used for less serious, yet inappropriate, behaviors and is encouraged as an alternative to the Administrative Resolution process to resolve conflicts. All parties must consent to the use of Alternate Resolution

The Title IX Coordinator determines if Alternate Resolution is appropriate, based on the willingness of the

parties, the nature of the conduct at issue, and the susceptibility of the conduct to Alternate Resolution.

In an Alternate Resolution meeting, a trained administrator facilitates a dialogue with the parties to an effective resolution, if possible. Institutionally imposed sanctions are not possible as the result of an Alternate Resolution process, though the parties may agree to accepted sanctions and/or appropriate remedies.

The Title IX Coordinator maintains records of any resolution that is reached, and failure to abide by the resolution can result in appropriate enforcement actions.

Alternate Resolution is not used to address reports of violent behavior of any kind or in other cases of serious violations of policy. The results of Alternate Resolution are not appealable.

Respondent Accepts Responsibility for Alleged Violations

The Respondent may accept responsibility for all or part of the alleged policy violations at any point during the resolution process. If the Respondent indicates an intent to accept responsibility for all of the alleged misconduct, the formal process will be paused, and the Title IX Coordinator implements the accepted finding that the Respondent is in violation of Hult policy and implements sanctions and/or remedies, in coordination with other appropriate administrator(s), as necessary.

When the parties cannot agree on all terms of resolution, the Formal Grievance Process will resume at the same point where it was paused.

When a resolution is accomplished, the appropriate sanction or responsive actions are promptly implemented to effectively stop the harassment or discrimination, prevent its recurrence, and remedy the effects of the discriminatory conduct, both on the Complainant and the community.

Formal Grievance Process

The Formal Grievance Process is used for complaints of sexual misconduct, sex discrimination, sex-based harassment, retaliation, and other prohibited conduct (as defined in Policy) or when informal resolution is either not elected or is unsuccessful.

The Formal Grievance Process consists of a hand-off of the investigation report and all relevant evidence to the Decision-maker to make a finding and determine sanctions (if applicable).

At the discretion of administrator, the assigned decision-maker will be an individual or a panel drawn from the resolution process pool, or other trained individuals either internal or external to the institution. Once the decision-maker receives and reviews the file, they can recommend dismissal to the administrator, if they believe the grounds are met.

The Formal Grievance Process typically takes approximately thirty (30) business days to complete, beginning with the decision-maker's receipt of the investigation report. The parties will be regularly updated on the timing and any significant deviation from this typical timeline.

Investigator-led Questioning Meetings

- The administrator provides the draft investigation report to the decision-maker and the parties simultaneously for review. The decision-maker can then provide the investigator with a list of relevant questions to ask the parties or any witnesses.
 - To the extent credibility is in dispute and relevant to one or more of the allegations, the questions provided by the decision-maker may also explore credibility.
- The investigator will also ask each of the parties to provide a proposed list of questions to ask the other Parties and any witnesses.

- To the extent credibility is in dispute and relevant to one or more of the allegations, questions proposed by the parties may also explore credibility.
- All party questions must be posed during this phase of the process and cannot be posed later unless authorized by the decision-maker.
- The investigator will share all party-proposed questions with the decision-maker, who will finalize the list with the investigator to ensure all questions are both relevant and permissible.
- The investigator will then hold individual meetings with the parties and witnesses to ask the questions posed by the decision-maker, as well as the questions proposed by the parties that have been deemed relevant and not duplicative, including questions intended to assess credibility. These meetings will be recorded and transcribed.
 - For any question deemed not relevant or duplicative, the investigator will provide a rationale for not asking the question, either during the recorded meeting, or in writing (typically as an appendix to the final investigation report).
- Typically, within three (3) business days of the last of these meetings, the recordings or transcripts of them will be provided to the parties for their review. The parties will then have five (5) business days to review these recordings or transcripts and propose any follow-up questions for the investigator to ask.
- The investigator will review the proposed questions with the decision-maker to determine relevance and permissibility. If deemed necessary, the investigator will then meet individually with the parties or witnesses for whom there are relevant, and not duplicative, follow-up questions. These follow-up meetings will also be recorded, and the parties will receive the recordings or transcripts of these meetings. This final round of questioning is the last round permitted, unless permission is granted to extend by the decision-maker.
- The investigator will then incorporate any new, relevant evidence and information obtained through the parties' review of the draft investigation report, the questioning, and follow-up meetings into a final investigation report.
- The investigator will also respond in writing (typically within the final investigation report) to the relevant elements of the parties' responses to the draft investigation report and incorporate relevant elements of the parties' written responses, additional relevant evidence, and any necessary revisions into the final investigation report.
- The investigator will then share the final investigation report with the administrator and/or legal counsel for their review and feedback.
- The investigator will then provide the administrator with the final investigation report and investigation file.

Decision-maker's Determination

- The administrator will provide the decision-maker, the parties, and their advisors with the final investigation report (FIR) and investigation file, including the evidence and information obtained through the investigator-led questioning meetings.
- The decision-maker will review the FIR, all appendices, and the investigation file.
- If the record is incomplete, the decision-maker may direct a re-opening of the investigation, or may direct or conduct any additional inquiry necessary, including informal meetings with the parties or any witnesses, if needed.
- Upon reviewing the relevant evidence, the decision-maker may also choose to pose additional questions:
 - To the extent credibility is in dispute and relevant to one or more of the allegations, the decision-maker may meet individually with the parties and witnesses to question them in order to assess their credibility. These meetings will be recorded, and the recording or transcript will be shared with the parties.
 - At their discretion, the decision-maker may also meet with any party or witness to ask additional relevant questions that will aid the decision-maker in making their findings. These meetings will be recorded, and the recording or transcript will be shared with the parties.

- The decision-maker will then apply the preponderance of the evidence standard **OR** clear and convincing evidence standard to make a determination on each of the allegations and, if applicable, any associated sanctions.
- **Timeline.** The decision-maker's determination process typically takes approximately ten (10) business days, but this timeframe can vary based on a number of factors and variables. The parties will be notified of any delays.
- **Impact Statements.** Prior to a determination, the administrator will also provide the Parties with an opportunity to submit a written impact and/or mitigation statement. The administrator will review these statements upon receipt to determine whether there are any immediate needs, issues, or concerns, but will otherwise hold them until after the decision-maker has made determinations on the allegations. If there are any findings of a policy violation, the decision-maker will request the Impact Statements from the administrator and review them prior to determining sanctions. They will also be exchanged between the parties at that time.
- If it is later determined that a party or witness intentionally provided false or misleading information, that action could be grounds for re-opening a resolution process at any time, and/or referring that information to another process for resolution.

Deliberation, Decision-making, and Standard of Proof

The Decision-maker(s) will deliberate in closed session to determine whether the Respondent is responsible or not responsible for the policy violation(s) in question. If a panel is used, a simple majority vote is required to determine the finding. The preponderance of the evidence standard of proof is used.

The parties may each submit a written impact statement prior to the hearing for the consideration of the Decision-maker at the sanction stage of the process when a determination of responsibility is reached. When there is a finding of responsibility on one or more of the allegations, the Decision-maker may then consider this impact statements in determining appropriate sanction(s).

The Chair will ensure that each of the parties has an opportunity to review any impact statement submitted by the other party. The Decision-maker may – at their discretion – consider the statements, but they are not binding.

The Decision-maker will review the statements and any pertinent conduct history and will determine the appropriate sanction(s)

The Chair will then prepare a written deliberation statement and deliver it to the Title IX Coordinator, detailing the determination, rationale, the evidence used in support of its determination, the evidence disregarded, credibility assessments, and any sanctions. This report must be submitted to the Title IX Coordinator within five (5) business days of the end of deliberations, unless the Title IX Coordinator grants an extension. If an extension is granted, the Title IX Coordinator will notify the parties.

Notice of Outcome

Using the deliberation statement, the Title IX Coordinator will work to prepare a Notice of Outcome. The Title IX Coordinator will then share the letter, including the final determination, rationale, and any applicable sanction(s) with the parties and their Advisors within five (5) business days of receiving the decision-maker's deliberation statement.

The Notice of Outcome will identify the specific policy reported to have been violated, including the relevant policy section, and will contain a description of the procedural steps taken by Hult from the receipt of the misconduct report to the determination, including any and all notifications to the parties, interviews with parties and witnesses, site visits, methods used to obtain evidence, and hearings held.

The Notice of Outcome will summarize the finding on each alleged policy violation; the findings of fact that support the determination; conclusions regarding the application of the relevant policy to the facts at issue; a

statement of, and rationale for, the result of each allegation, any sanctions issued which Hult is permitted to share according to applicable law; and any remedies provided to the Complainant designed to ensure access to Hult's educational or employment program or activity, to the extent Hult is permitted to share such information under applicable law (this detail is not typically shared with the Respondent unless the remedy directly relates to the Respondent).

The Notice of Outcome will also include information on when the results are considered by Hult to be final, any changes that occur prior to finalization, and the relevant procedures and bases for any available appeal options.

Sanctions

Factors considered when determining a sanction/responsive action may include, but are not limited to:

- The nature, severity of, and circumstances surrounding the violation(s)
- The Respondent's disciplinary history
- Previous allegations or allegations involving similar conduct
- The need for sanctions/responsive actions to bring an end to the discrimination, harassment, and/or retaliation
- The need for sanctions/responsive actions to prevent the future recurrence of discrimination, harassment, and/or retaliation
- The need to remedy the effects of the discrimination, harassment, and/or retaliation on the Complainant and the community
- The impact on the parties
- Any other information deemed relevant by the Decision-maker

The sanctions will be implemented as soon as is feasible, either upon the outcome of any appeal or the expiration of the window to appeal without an appeal being requested. The sanctions described in this policy are not exclusive of, and may be in addition to, other actions taken, or sanctions imposed by external authorities.

Student Sanctions

The following are the usual sanctions that may be imposed upon students singly or in combination:

- *Warning*: A formal statement that the conduct was unacceptable and a warning that further violation of any Hult policy, procedure, or directive will result in more severe sanctions/responsive actions.
- *Social Probation*: A written reprimand for violation of institutional policy, providing for more severe disciplinary sanctions if the student or organization is found in violation of any institutional policy, procedure, or directive within a specified period of time. Terms of the probation will be articulated and may include denial of specified social privileges, exclusion from co-curricular activities, exclusion from designated areas of campus, no-contact orders, and/or other measures deemed appropriate.
- *Suspension*: Termination of student status for a definite period of time not to exceed two years and/or until specific criteria are met. Students who return from suspension are automatically placed on probation through the remainder of their tenure as a student at Hult.
- *Dismissal*: Permanent termination of student status and revocation of rights to be on campus for any reason or to attend Hult-sponsored events.

Employee Sanctions

Responsive actions for an employee who has engaged in harassment, discrimination, and/or retaliation include:

- *Warning – Verbal or Written*
- *Performance Improvement/Management Process*

- *Required Training or Education*
- *Probation*
- *Loss of Oversight or Supervisory Responsibility*
- *Demotion*
- *Suspension with pay*
- *Suspension without pay*
- *Termination*
- *Other Actions:* Hult may assign any other sanctions as deemed appropriate.

Withdrawal or Resignation While Charges Pending

Students: If a student has an allegation pending for violation of Hult may place a hold on a student's ability to graduate and/or to receive an official transcript/diploma. Should a student decide to not participate in the resolution process, the process proceeds absent their participation to a reasonable resolution. Should a student Respondent permanently withdraw from Hult, the resolution process ends, as Hult no longer has disciplinary jurisdiction over the withdrawn student.

However, Hult will continue to address and remedy any systemic issues, variables that may have contributed to the alleged violation(s), and any ongoing effects of the alleged harassment, discrimination, and/or retaliation. The student who withdraws or leaves while the process is pending may not return to Hult. Such exclusion applies to all campuses of Hult. A hold will be placed on their ability to be readmitted. They may also be barred from Hult property and/or events.

If the student Respondent only withdraws or takes a leave for a specified period of time (e.g., one semester or term), the resolution process may continue remotely and that student is not permitted to return to Hult unless and until all sanctions have been satisfied.

During the resolution process, Hult may put a hold on a responding student's transcript or place a notation on a responding student's transcript or dean's disciplinary certification that a disciplinary matter is pending.

Employees: Should an employee Respondent resign with unresolved allegations pending, the resolution process ends, as Hult no longer has disciplinary jurisdiction over the resigned employee.

However, Hult will continue to address and remedy any systemic issues, variables that contributed to the alleged violation(s), and any ongoing effects of the alleged harassment or discrimination.

The employee who resigns with unresolved allegations pending is not eligible for rehire with Hult or any campus of Hult, and the records retained by the Title IX Coordinator will reflect that status. All Hult responses to future inquiries regarding employment references for that individual will include that the former employee resigned during a pending disciplinary matter.

Filing an Appeal

Either party may appeal the finding if there is:

- a procedural error that affected the outcome
- bias on the part of an investigative or decision-making party that affected the outcome
- new evidence that was not reasonable available at the time the determination was made and would affect the outcome of the matter.

The appeal must be filed within 14 calendar days of the receipt of the Title IX decision, unless good cause can be

shown for an extension of time. The appeal must be sent to the Global Appeals Panel. If the request for appeal does not meet the grounds in this policy, that request will be denied, and the parties will be notified in writing of the denial and the rationale.

Any sanctions imposed because of the hearing are stayed during the appeal process. Supportive measures may be reinstated, subject to the same supportive measure procedures above. All approved appeals will be sent to the Global Appeals Committee. If the appeal has new information, the file will go back to the original decision maker for re- review.

If the appeal team has questions, they can contact the student. They will not re-investigate the case unless they find bias or a procedural error. If bias is found, the case will be re-investigated from the start, including all witness interviews and statements and hearings. The appeal team will not discuss the case with the decision maker, except to ask procedural questions.

A Notice of Appeal Outcome will be sent to all parties including the decision on each approved ground and rationale for each decision. The Notice of Appeal Outcome will specify the finding on each ground for appeal, any specific instructions for remand or reconsideration, any sanctions that may result which Hult is permitted to share according to state or federal law. The decision of the Global Appeal Committee is final.

Conflict of Interest and Abuse of Power

All employees, including faculty, staff, administrators, and contractors, must maintain professional boundaries with students and avoid any situations that create actual or perceived conflicts of interest, favoritism, or abuse of power. A conflict of interest arises when an employee's personal, financial, or relational interests compromise, or appear to compromise, their ability to act in the best interests of students or the institution.

Examples of conflicts of interest include, but are not limited to:

- Personal or financial relationships that may influence academic or professional decisions.
- Supervisory, evaluative, or mentoring roles involving a student with whom the employee has a personal relationship.
- Any action that could reasonably be perceived as granting an unfair advantage.

The institution will implement appropriate measures to eliminate or manage the conflict to protect the integrity of academic and professional processes.

Personal Relationships Between Faculty/Staff and Students

Relationships between faculty/staff and students can disrupt our commitment to provide a fair and equitable educational and professional environment free from actual or perceived conflicts of interest, favoritism, or exploitation. To protect the academic integrity and professional nature of the educational experience, faculty and staff should not engage in romantic or intimate relationships with currently enrolled students.

In the event of a pre-existing relationship which existed prior to enrollment or employment, the school asks that the employee disclose the relationship, and the parties will explore appropriate accommodations, for example reassignment of supervisory or evaluative responsibilities. In no event should faculty or staff ever be involved in intimate relationships with students over whom they exercise direct academic or professional authority (teaching, advising, supervising, or evaluating). The People & Culture team is available to provide guidance to any employee with questions regarding this policy.

Training

All officials who are involved in the discrimination grievance process, including the Title IX staff, designated investigators, decision makers, hearing panel members, hearing panel chair, will have adequate training. Training will address, but is not limited to, recognizing, and appropriately responding to allegations of discrimination, harassment, including hostile environment harassment, sexual misconduct, and retaliation, conducting investigations, protecting confidentiality, and recognizing the link between alcohol and drug use and sexual assault and sexual harassment.

Involved officials must complete mandatory annual training to refresh their knowledge of policy and the effective management of the associated grievance and resolution processes. Additionally, all Hult faculty and staff are mandated to complete an annual training to address topics of sexual harassment. This occurs via the use of a live session presented at the start of each academic year and via the use of a mandatory follow-up online training module.

Policy Changes

This Policy succeeds previous policies addressing sex discrimination, sex-based harassment, sexual misconduct, and/or retaliation, though previous policies and procedures remain in force for sexual harassment incidents occurring before August 1, 2024. Hult reviews and updates these policies and procedures regularly. The school reserves the right to make changes to this document as necessary, and once those changes are posted online, they are in effect. Hult will inform students of materials changes.

If government laws or regulations change or court decisions alter the requirements in a way that impacts this document, this document will be construed to comply with the most recent government laws, regulations, or court holdings.

This document does not create legally enforceable protections beyond the protections of the background laws that frame such policies and codes, generally.

External Complaints

If you filed a complaint with the Title IX staff and believe the response was inadequate, or you otherwise believe you have been discriminated against by the school, you may be able to file with external offices, including but not limited to:

United States of America (USA)

U.S. Department of Education, Office for Civil Rights - Boston Office

Telephone: (617) 289-0111 Email: OCR.Boston@ed.gov Website: www.2ed.gov/about/offices/list/oc

U.S. Department of Education, Office for Civil Rights – San Francisco Office

Telephone: (415) 486-5555 Email: OCR.SanFrancisco@ed.gov Website: www.2ed.gov/about/offices/list/oc

U.S. Equal Employment Opportunity Commission

Responsible for enforcing federal laws that make it illegal to discriminate against a job applicant or employee because of the person's race, color, religion, sex, national origin age, disability of genetic information.

Telephone: (800)-669-4000 Email: info@eeoc.gov

United Kingdom (UK)

Equity and Human Rights Commission (EHRC)

Enforcement of the Equality Act of 2010.
Website: <https://www.equalityhumanrights.com>

Office of the Independent Adjudicator (OIA)
Website: <https://www.oiahe.org.uk>

Office for Students (Ofs)
Website: <https://www.officeforstudents.org.uk>

United Arab Emirates (UAE)

Ministry of Education (MOE)
Investigate issues relating to institutional compliance including harassment complaints.
Website: <https://www.moe.gov.ae>