



Sexual Harassment & Title IX Policy

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Sexual Harassment and Title IX Policy

Hult International Business School (“Hult”) operates as a global institution with international programs and locations. Hult is committed to providing an educational, living, and employment environment that is free from sex discrimination, sex-based harassment, and retaliation for engaging in protected activity. This commitment applies to all members of the Hult community, including students, faculty, staff, guests, and visitors, regardless of location.

Hult values and upholds the equal dignity of all individuals and seeks to balance the rights of all parties in the resolution process during what is often a difficult time for those involved.

Hult does not discriminate based on sex in any of its educational programs or activities, including admissions and employment, and is committed to preventing and addressing harassment and misconduct when it occurs. This includes discrimination based on pregnancy or related conditions.

Title IX of the U.S. Education Amendments of 1972 (“Title IX”) is a U.S. federal civil rights law that prohibits sex-based discrimination in education programs and activities. For purposes of the Title IX grievance process, Title IX applies only where the alleged conduct occurred in a Hult education program or activity and against a person in the United States, as required by applicable federal regulations. Conduct occurring outside those jurisdictional requirements may still be addressed under Hult’s Sexual Harassment Policy and other applicable institutional policies.

Where Title IX does not apply or does not have jurisdiction, Hult will address conduct under its Sexual Harassment Policy and applicable local laws and regulatory frameworks.

In addition to Title IX, Hult also complies with applicable laws and regulations in other jurisdictions in which it operates, including the United Kingdom Equality Act 2010, the Protection from Harassment Act 1997, and regulatory expectations set by the Office for Students (Condition E6), which prohibit harassment and require higher education providers to take steps to prevent and address sexual misconduct and harassment.

Hult seeks to comply with all applicable federal, state, and local laws, regulations, and ordinances prohibiting sex discrimination in post-secondary education institutions.

Definitions

Sexual Misconduct

Sexual misconduct is any unwanted or attempted unwanted conduct of a sexual nature. Sexual misconduct can occur between individuals of any sex or gender and may occur in any relationship context, including but not limited to acquaintances, dating partners, or strangers. This includes, but is not limited to:

- dating violence or abuse*
- domestic violence
- image-based abuse, including non-consensual creation, sharing or distributing of intimate images
- Indecent exposure
- non-consensual sexual contact
- non-consensual sexual intercourse
- quid pro quo sexual harassment
- reproductive coercion
- retaliation**
- sexual assault, including rape
- sexual coercion
- sexual exploitation
- sexual harassment***
- sexual intimidation
- sexual violence****

- sexually explicit verbal communication and speech
- stalking
- technology-facilitated sexual misconduct or abuse, including revenge porn
- voyeurism

Dating Violence or Abuse*

Dating violence or abuse is violence committed by a person who is or has been in a social, romantic, or intimate relationship with the Complainant. The existence of such a relationship is determined based on the length, type, and frequency of interaction between the parties.

Dating violence or abuse includes, but is not limited to, physical harm, sexual assault, emotional or psychological abuse, threats, intimidation, coercion, or controlling behavior that occurs within the context of a dating or intimate relationship.

Dating violence or abuse may occur between individuals of any sex or gender and includes conduct that would constitute domestic violence if the parties were spouses or cohabitants.

Retaliation**

Retaliation is any adverse action taken against a person for reporting, participating in, or supporting the reporting or resolution of an allegation under this policy. Retaliation includes, but is not limited to, intimidation, threats, coercion, harassment, or discrimination against any person who has made a report or complaint, testified, assisted, participated, or refused to participate in any manner in an investigation or proceeding under this policy. Retaliation may be committed by any member of the Hult community, including students, employees, and third parties.

Sexual Harassment***

Sexual harassment is unwelcome conduct of a sexual nature, whether verbal, physical, or electronic, that has the purpose or effect of (a) violating a person's dignity, or (b) creating an intimidating, hostile, degrading, humiliating, or offensive environment. This includes, but is not limited to, unwanted sexual advances, requests for sexual favors, and other conduct of a sexual nature. A single incident can constitute sexual harassment. This definition applies to all Hult campuses globally.

Sexual Harassment Under Title IX

For conduct occurring within Hult's education programs or activities in the United States, Title IX defines sexual harassment 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 an incident or incidents of sexual assault, dating violence, domestic violence, or stalking as defined in the Clery Act (20 U.S.C. § 1092(f)(6)(A)(v)) and the Violence Against Women Act (34 U.S.C. § 12291(a)) which takes place on one of the Hult campuses, or at an event or program controlled or managed by Hult.

Conduct meeting the Title IX definition is subject to the Title IX grievance procedures set forth in this policy, including the live hearing and cross-examination requirements applicable to postsecondary institutions. Conduct that meets Hult's institutional definition of sexual harassment but does not meet the Title IX definition will be addressed under Hult's general resolution procedures.

Sexual Violence****

Sexual violence is any sexual act or attempt to obtain a sexual act directed against another person without their consent. It includes situations where consent cannot be given or is not freely and affirmatively given.

Sexual violence includes, but is not limited to, sexual assault, rape, attempted rape, fondling, sexual coercion, and any unwanted sexual contact or conduct of a sexual nature. Sexual violence may occur through physical force, threat,

intimidation, manipulation, or when a person is incapacitated due to alcohol, drugs, unconsciousness, or any other condition that impairs the ability to give consent.

Sexual violence can occur between individuals of any sex or gender and may occur in any relationship context, including but not limited to acquaintances, dating partners, or strangers.

Sexual Consent

Sexual Consent is a clear, knowing, and voluntary agreement to engage in specific sexual activity. Consent must be freely given and can be communicated through words or actions that clearly indicate willingness to participate. Consent cannot be assumed from silence, lack of resistance, or prior relationships or interactions. It can be withdrawn at any time, and once withdrawn, all sexual activity must stop immediately. Consent cannot be obtained through coercion, force, threats, or manipulation, and cannot be given by individuals who are incapacitated due to alcohol, drugs, or other conditions that impair their ability to make informed decisions.

Inclusion Related to Gender Identity/Expression

Hult strives to ensure that all individuals are safe, included, and respected in their education, employment, and living environments, regardless of their gender identity or expression, including those who may identify as cisgender, intersex, nonbinary, transgender, agender, or two-spirit.

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 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 a welcoming and inclusive community.

This policy should be interpreted consistent with goal of supporting the inclusion of intersex, transgender, transitioning, agender, nonbinary, and gender-diverse students and employees, including but not limited to:

- Maintaining the privacy of all individuals consistent with law
- Ensuring all students have equal access to educational programming, activities, and facilities
- 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 rights 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. If that is not possible, Hult will offer remedial solutions or enforce its policies while also respecting the rights of all members of its community.

Pregnancy or Related Conditions

Hult prohibits discrimination based on pregnancy, childbirth, termination of pregnancy, lactation, recovery from

pregnancy-related conditions, and related medical conditions. Students and employees may request reasonable accommodation, modifications, leaves of absence, academic adjustments, schedule adjustments, lactation support, and other measures necessary to ensure equal access to Hult programs and activities. Requests should be directed to the Title IX Coordinator or appropriate institutional office.

Academic Freedom and Freedom of Speech

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. For more information, please review Hult's [Academic Freedom and Freedom of Speech Policy](#).

Reporting

Any person may report alleged sexual harassment, discrimination, violence, assault, relationship abuse, or relationship violence, whether the reporting party is the individual alleged to have been impacted, a witness, or otherwise aware of a possible incident. Reports are welcomed by any means, including in person, verbally, in writing via traditional or electronic mail, by phone, through the [online reporting form](#), or by using the contact information for the Title IX Coordinator listed below.

Reports may also be made to any Hult staff or faculty member, as all staff and faculty are designated mandatory reporters. Hult will accept anonymous complaints or reports; however, the institution's ability to respond may be limited if only minimal information is provided. Staff and faculty members are required to share reports, including available contact information, with the appropriate institutional officials. The Respondent is presumed not responsible for the alleged conduct unless and until a determination regarding responsibility is made at the conclusion of the grievance process.

For purposes of this Policy, a formal complaint is submitted and signed by a Complainant or signed by the Title IX Coordinator alleging sexual harassment under Title IX and requesting that Hult investigate the allegation. A Formal Complaint may be submitted in person, by mail, electronically, or by any other method authorized by Hult and must contain the Complainant's physical or digital signature or otherwise indicate that the Complainant (or Title IX Coordinator) is the person filing the complaint and is requesting that Hult investigate the allegations.

The following person has been designated to handle inquiries regarding this policy:

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

This person is designated as the institution's Title IX Coordinator based on the requirements of that U.S. federal civil rights law.

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.

The online reporting form can be found here: <https://hult.formstack.com/forms/hultixreportform>

Mandatory Reporting

All Hult employees are required to report any alleged or possible sexual harassment, sexual misconduct, sex-based discrimination, or retaliation involving any member of the Hult community to the Title IX Coordinator or the local campus coordinator within 24 hours of becoming aware of the situation. This obligation applies globally and is a condition of employment at Hult.

The only exception applies to any licensed on-campus counselors acting within their counseling capacity, who may maintain confidentiality except in situations involving an imminent risk of harm.

Institutional Knowledge Under Title IX

For purposes of Title IX, Hult is deemed to have "actual knowledge" of sexual harassment when the Title IX Coordinator or an Official with Authority to institute corrective measures receives notice. Hult's Officials with Authority include the Title IX Coordinator; the General Counsel; the Vice President of People & Culture; the Provost & Executive Vice President; and the Executive Dean of Undergraduate Programs. When any of these individuals receives a report or otherwise becomes aware of conduct that may constitute sexual harassment, Hult's obligation to respond with supportive measures under Title IX is triggered regardless of whether a formal complaint has been filed. The formal grievance process does require receipt of a formal complaint. The all-employee reporting requirement above is an institutional policy designed to ensure that information reaches these officials promptly; it does not, by itself, make every employee an Official with Authority under Title IX.

Hult recognizes that allegations under this Policy may include multiple forms of sexual misconduct, discrimination and sex-based misconduct, 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 Hult exercises substantial control over both the Respondent and the context in which the conduct occurred), circumstances where 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 Hult interest. These broader jurisdictional provisions apply to institutional policy enforcement. For Title IX matters, jurisdiction is limited to conduct meeting the requirements of Title IX as defined above. A substantial 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 peace, and/or causes social disorder.
4. Any situation that substantially interferes with Hult's educational interests or mission.

Where local law imposes greater protections, procedural rights, reporting obligations, or remedies than those contained in this Policy, Hult will comply with the applicable local law. Where local law conflicts with this Policy, the local legal requirement shall control to the extent required by law.

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 the extent they are applicable to the services provided.

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 and reasonably available, without fee or charge to restore or preserve access to Hult's education programs or activities, protect the safety of the parties and educational environment, and deter sexual harassment and/or retaliation.

The Title IX Coordinator will promptly offer supportive measures upon receiving notice or a complaint and will inform the Complainant, in writing, of the option to file a formal complaint if one has not already been filed. The Title IX Coordinator will consider the wishes of the parties in determining and implementing supportive measures.

Hult will maintain the privacy of supportive measures to the extent possible and will seek to minimize any academic or occupational impact or present an unreasonably burden either party. This action may include, but are not limited to:

- Referral to counseling, medical, healthcare, or community-based support services
- Referral to a Student or Employee Assistance Program
- Student financial aid counseling
- Adjustments to campus housing, work arrangements, or class schedules
- Academic support, deadline extensions, withdrawals, or leaves of absence
- Safety planning and transportation accommodations
- Mutual no-contact orders between the parties
- Increased security or monitoring in designated campus areas
- Pregnancy-related accommodations, including breastfeeding support and other reasonable accommodations
- Any other supportive measures deemed appropriate by the Title IX Coordinator

Violations of no contact orders will refer 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

Hult will refer parties to confidential support resources available through student health insurance programs, established student assistance programs, and local community-based providers. Conversations with confidential resources are kept strictly confidential and, except in rare circumstances involving imminent risk of harm to self or others or as otherwise required by law, information will not be shared without your permission.

Immediate Action and Emergency Removal

Hult may remove a Respondent, in whole or in part, from the education program or activities on an emergency basis when an individualized safety and risk assessment determines there is an immediate threat to the physical health or safety of any individual. This assessment is conducted by the Title IX Coordinator in consultation with campus leadership and the Campus Emergency Team.

Hult may place a non-student employee Respondent on administrative leave during the pendency of an investigation or grievance process, consistent with applicable law, employment agreements, and institutional policy.

In all cases, the Respondent will receive notice of the emergency removal and an opportunity to meet with the Title IX Coordinator, either in advance or as soon as reasonably practicable thereafter, to challenge or request modification of the action.

This meeting is an administrative review and not a hearing on the merits of the allegations. If not timely requested, any objection to the emergency removal will be waived. A Complainant and Advisor may participate where permitted. A Respondent may be accompanied by an Advisor and will receive a written summary of the basis for the removal in advance.

The Title IX Coordinator has sole discretion to impose, modify, or lift an emergency removal and to determine its scope and duration. Violation of an emergency removal may result in additional sanctions, including dismissal or termination.

Hult will apply the least restrictive measures necessary, which may include removal from housing, temporary reassignment, access restrictions, administrative leave, withdrawal or grading accommodations, and limits on participation in extracurricular or employment activities. Where appropriate, alternative academic arrangements may be provided to minimize impact.

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.

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.

Hult may consolidate formal complaints arising out of the same facts or circumstances involving the same parties.

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.

A complaint may be dismissed from the Title IX grievance process if the alleged conduct does not meet the jurisdictional requirements of Title IX. A Title IX complaint must be dismissed from the Title IX grievance process if the alleged conduct did not occur in Hult's education program or activity or did not occur against a person in the United States. A complaint may also be dismissed on a discretionary basis where permitted under applicable regulations, such as when a Complainant requests to withdraw the complaint, the Respondent is no longer enrolled or

employed by Hult, or specific circumstances prevent Hult from gathering sufficient evidence to reach a determination.

A dismissal under Title IX is procedural in nature and does not preclude Hult from addressing the alleged conduct under its Sexual Harassment Policy, Student Conduct Process, or applicable employee disciplinary procedures, as appropriate.

Upon any dismissal, Hult will provide written notice simultaneously to the parties, including the rationale for the dismissal. Either party may appeal the dismissal in accordance with the appeal procedures set forth 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 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 end 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 the 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 asked 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 of Complaint

Hult will act on any Notice, Complaint, or Knowledge of a potential violation of the policy that the coordinator 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 people 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 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, and if so, determining which resolution process applies:
 - Title IX conduct: If the conduct, as alleged, meets the definition of sexual harassment under Title IX (i.e., quid pro quo, severe and pervasive and objectively offensive conduct, or sexual assault, dating violence, domestic violence, or stalking occurring within Hult's U.S. education program or activity), the Title IX Coordinator will initiate the Title IX grievance process.
 - Non-Title IX policy violation: If the conduct does not meet the Title IX threshold but may reasonably constitute a violation of Hult's institutional definition of sexual harassment, sexual misconduct, or other prohibited conduct under this Policy, the Title IX Coordinator will address the matter under Hult's general conduct procedures. A dismissal under Title IX is procedural only and does not limit Hult's authority to investigate and impose sanctions under its own policies. For student respondents, this refers to the Student Conduct Process in the Student Handbook; for employees, this refers to the Employee Disciplinary Procedures in the Employee Handbook.
 - No policy violation: If the conduct may not reasonably constitute a violation of this Policy, the matter is typically dismissed from this process, consistent with the dismissal provisions 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 will include:

- A meaningful summary of the allegations
- The identities of the parties involved, if known
- The specific policies implicated
- A description of applicable procedures
- A statement regarding Hult's policy on retaliation
- Information on the privacy of the process
- Information on the requirement that each party have an Advisor of their choosing, including guidance on how to identify one
- A statement that Hult's Policy prohibits knowingly making false statements, including during the resolution process
- Information on how to request disability accommodation 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.

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:

1. When the parties agree to resolve the matter through an alternate resolution mechanism
2. When the Respondent accepts responsibility for violating policy, and desires to accept a sanction and end the resolution process; or
3. 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 or a formal complaint may be filed by the Title IX Coordinator. 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 resolutions 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 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 this Policy when Informal Resolution is either not elected, not appropriate, or unsuccessful. Respondents are presumed not responsible for the alleged conduct unless and until a determination regarding responsibility is made at the conclusion of the grievance process.

For complaints that meet the definition of sexual harassment under Title IX and are subject to the Title IX Grievance Process, the institution will conduct a Live Hearing following the completion of the investigation and review of evidence process. For matters that do not fall within the scope of Title IX but may constitute a violation of this Policy, Hult may utilize its applicable student conduct or employee disciplinary procedures, consistent with the Initial Evaluation provisions of this Policy.

The Formal Grievance Process consists of the following stages:

1. Investigation
2. Review of Evidence and Investigation Report
3. Live Hearing
4. Determination Regarding Responsibility
5. Sanctions and Remedies, if applicable
6. Appeal

The institution will strive to complete the Formal Grievance Process within reasonably prompt timeframes; however, the length of the process may vary depending on the complexity of the allegations, the number of witnesses, the availability of the parties and advisors, concurrent law enforcement activity, breaks in the academic calendar, or other good cause. The parties will receive periodic updates regarding the status of the process and notice of any significant delays.

The investigator(s) and Title IX Coordinator are responsible for gathering and assessing evidence but do not determine responsibility. Responsibility determinations are made solely by the designated Decision-maker following completion of the hearing process. The Decision-maker shall not be the Title IX Coordinator, an investigator involved in the matter, or any person responsible for facilitating an informal resolution formal outcome.

Investigation

The institution will conduct an adequate, reliable, impartial, and thorough investigation of the allegations raised in the complaint.

The burden of proof and the burden of gathering evidence rests on the institution and not on the parties. Both parties will have an equal opportunity to:

- Present relevant witnesses;
- Submit relevant inculpatory and exculpatory evidence;
- Identify potential sources of information; and
- Respond to evidence gathered during the investigation.

The investigator may conduct interviews with the parties and witnesses and collect relevant statements, electronic, photographic, audio, video, or other evidence.

The institution will provide both parties with an equal opportunity to have an Advisor of their choice present during any meeting, interview, or proceeding related to the resolution process.

Advisors may accompany and support their respective party throughout the investigation process but may not speak on behalf of a party, answer questions for a party, disrupt proceedings, or otherwise actively participate in investigative interviews except as permitted by the institution.

Review of Evidence and Investigation Report

Following the conclusion of the investigation, the investigator will prepare a draft investigation report that fairly summarizes the relevant evidence obtained during the investigation.

The investigator will provide the draft investigation report and all evidence directly related to the allegations to the parties and their Advisors simultaneously for review and written response.

The parties will have at least ten (10) business days to review the materials and submit a written response, including any additional relevant information, clarification, or proposed follow-up investigation steps. The parties may elect to waive all or part of this review period.

The investigator will review the parties' responses and conduct any additional investigative steps deemed appropriate.

The investigator will then prepare a final investigation report that fairly summarizes the relevant evidence.

The final investigation report will be provided simultaneously to the parties, their Advisors, and the Decision-maker at least ten (10) business days before the Live Hearing.

Live Hearing

For complaints proceeding under the Title IX Grievance Process, the institution will conduct a Live Hearing before a Decision-maker following completion of the investigation and review of evidence process.

The purpose of the Live Hearing is to allow the Decision-maker to assess credibility, resolve disputed facts, consider relevant evidence, and decide regarding responsibility.

The Live Hearing may occur in person or through remote technology that enables participants simultaneously to see and hear one another.

At the request of either party, or at the institution's discretion, the parties may be in separate rooms or participate through separate technology that allows the Decision-maker and participants to simultaneously see and hear all participants.

The institution will establish reasonable rules of decorum and participation applicable to all participants.

Advisors and Cross-Examination

Each party must have an Advisor present at the Live Hearing.

If a party does not have an Advisor present, Hult will provide one without fee or charge for the purpose of conducting cross-examination. Only Advisors may conduct cross-examination of another party or witness during the Live Hearing. Parties are not permitted to personally conduct cross-examination.

Each party's Advisor may directly, orally, and in real time ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility.

If a party or witness does not submit to cross-examination at the Live Hearing, the Decision-maker will not rely on any statement of that party or witness in reaching a determination regarding responsibility, except that the Decision-maker may not draw an inference regarding responsibility based solely on a party's or witness's absence or refusal to submit to cross-examination

Advisors may not engage in abusive, harassing, intimidating, or disruptive conduct and must comply with all hearing procedures and decorum requirements established by the institution.

Relevance Determinations

Before a party or witness answers a cross-examination or other question, the Decision-maker will determine whether the question is relevant.

The Decision-maker will explain any decision to exclude a question as not relevant.

Questions and evidence regarding a Complainant's sexual predisposition or prior sexual behavior are not relevant unless:

- Such questions and evidence are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant; or
- Such questions and evidence concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.

The Decision-maker may exclude questions that are irrelevant, duplicative, abusive, harassing, or otherwise impermissible under this Policy or applicable law.

The institution may create an audio recording, audiovisual recording, or transcript of the Live Hearing and will make such recording or transcript available to the parties for inspection and review as required by law.

Impact and Mitigation Statements

Where there is a finding of responsibility for one or more policy violations, the parties will be provided an opportunity to submit written impact and/or mitigation statements for consideration in determining sanctions and remedies.

The parties will be provided with an opportunity to review any impact or mitigation statement submitted by the other party. Impact and mitigation statements are not binding upon the Decision-maker but may be considered together with the nature and severity of the conduct, prior conduct history, institutional safety considerations, and any other relevant factors in determining appropriate sanctions and remedies.

Standard of Proof

Hult uses the preponderance of the evidence standard in resolving complaints under this Policy. Under this standard, a determination regarding responsibility is made based on whether it is more likely than not that the alleged conduct occurred and constituted a violation of this Policy.

The Decision-maker will objectively evaluate all relevant and permissible evidence, including both inculpatory and exculpatory evidence, and will make credibility determinations without bias or reliance on a person's status as a Complainant, Respondent, or witness.

Determination Regarding Responsibility

Following the conclusion of the Live Hearing, the Decision-maker will evaluate all relevant and permissible evidence and determine whether the Respondent is responsible for the alleged policy violation(s) using the preponderance of the evidence standard.

The Decision-maker will issue a written determination simultaneously to the parties and their Advisors. The written determination will include:

- Identification of the allegations potentially constituting a Policy violation
- A description of the procedural steps taken from receipt of the report through the determination, including notifications, interviews, evidence review, investigation activities, and the hearing process
- Findings of fact supporting the determination
- Conclusions regarding the application of this Policy to the facts
- A statement of, and rationale for, the determination regarding responsibility for each allegation
- Any disciplinary sanctions imposed on the Respondent, if applicable
- Whether remedies designed to restore or preserve equal access to the institution's education program or activity will be provided to the Complainant
- Information regarding the procedures and permissible grounds for appeal

The institution will strive to issue the written determination within ten (10) business days following the conclusion of the Live Hearing. This timeframe may be extended for good cause with written notice to the parties.

The written determination constitutes the institution's Notice of Outcome.

Sanctions & Remedies

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 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 notice that the conduct violated Hult policy, along with a warning that further violations of any Hult policy, procedure, or directive will result in more severe sanctions or responsive actions.
- **Social Probation:** A written reprimand for violation of institutional policy. Social probation may include

heightened monitoring and/or additional conditions for continued enrollment. Terms will be specified in writing and may include loss of specified social privileges, exclusion from co-curricular activities or designated campus areas, no-contact orders, and/or other appropriate measures.

- **Educational or Restorative Measures:** Required participation in educational programs, training, counseling, reflective assignments, or other developmental or restorative interventions deemed appropriate.
- **Restrictions:** Limitations on access to campus areas, facilities, activities, organizations, leadership roles, or other privileges as determined appropriate.
- **No-Contact Directive:** A formal prohibition on direct or indirect contact with one or more members of the Hult community.
- **Housing or Residential Changes:** Removal from or reassignment within campus housing, where applicable.
- **Suspension:** Temporary termination of student status for a defined period not exceeding two years and/or until specified conditions are met. Students returning from suspension are placed on probation for the remainder of their enrollment at Hult.
- **Dismissal:** Permanent termination of student status and revocation of access to campus and Hult-sponsored activities or events.

Employee Sanctions

- Responsive actions for an employee who has engaged in harassment, discrimination, and/or retaliation include:
- **Warning (Verbal or Written):** Formal notice that conduct or performance violated Hult policy or expectations, with clarification of required corrective action and notice that further violations may result in additional corrective or disciplinary measures.
- **Performance Improvement / Management Process:** Formal process to address conduct or performance concerns, which may include performance expectations, monitoring, training, coaching, or corrective action plans within a specified timeframe.
- **Written Reprimand:** Formal written statement of policy violation placed in the employee's file, outlining required corrective actions and potential consequences for further violations.
- **Mandatory Training or Coaching:** Required participation in training, professional development, or coaching designed to address identified concerns.
- **Work Restrictions or Reassignment:** Modification of duties, responsibilities, reporting lines, or work location, as appropriate.
- **Final Warning:** Formal notice that further violations will result in more severe disciplinary action, up to and including termination.
- **Suspension (with or without pay, where applicable):** Temporary removal from duties for a defined period.
- **Termination:** Permanent separation from employment and revocation of access to Hult systems, facilities, and activities.

Please review the relevant sections of the Employee Handbook.

Notice of Outcome

The Decision-maker issues the written determination; the Title IX Coordinator distributes it. This provided to all parties and their advisors, where allowed by applicable privacy laws, within five (5) business days of receipt.

The Notice of Outcome will include:

- The specific Policy provisions alleged to have been violated;
- A description of the procedural steps taken from the initial report through the final determination, including all notices to the parties, interviews, evidence collection, and any hearing or questioning process;
- Findings of fact supporting the determination;
- Conclusions regarding the application of the Policy to the facts;
- The determination regarding responsibility for each allegation, including the rationale for each finding; and
- Any sanctions imposed and, where permitted, a summary of remedies designed to restore or preserve equal access to Hult's education or employment programs or activities.

The Notice of Outcome informs when the determination becomes final, any changes made prior to finalization, and the procedures and bases for available appeal.

Withdrawal or Resignation While Charges Pending

Students: If a student has an allegation pending under this policy, Hult may place a hold on graduation and/or the release of official transcripts or diplomas. If a student chooses not to participate in the resolution process, it may proceed in their absence to a reasonable resolution.

If a student Respondent permanently withdraws from Hult, the resolution process will end due to loss of disciplinary jurisdiction. However, Hult will continue to address and remedy any systemic issues, contributing factors, and ongoing effects of the alleged harassment, discrimination, or retaliation. The student will be ineligible for readmission to any Hult campus and may be barred from Hult property and/or events. A hold will be placed on eligibility for readmission.

If a student Respondent withdraws or takes a leave for a defined period (e.g., one semester or term), the resolution process may continue remotely, and the student may not return until all sanctions, if any, are satisfied. During the resolution process, Hult may place a hold on a student's transcript and/or include a notation on a transcript or dean's disciplinary certification indicating that a disciplinary matter is pending.

Employees: If an employee Respondent resigns with unresolved allegations pending, the resolution process will end due to loss of institutional jurisdiction. Hult will continue to address and remedy any systemic issues, contributing factors, and ongoing effects of the alleged harassment or discrimination.

The employee will be ineligible for rehire at Hult or any campus of Hult, and institutional records will reflect that status. Any future employment reference inquiries will state that the individual 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.

An appeal must be submitted in writing within fourteen (14) calendar days of receipt of the written determination or dismissal, unless good cause is shown for an extension. Appeals must be submitted to the Global Appeals Panel.

Upon receipt of an appeal, the other party will be provided with written notice of the appeal and an equal opportunity to submit a written statement in support of, or in opposition to, the appeal. Appeals will be decided by an impartial Appeals Decision-maker or Appeals Panel member who was not previously involved in the matter as the Title IX Coordinator, investigator, hearing officer, Decision-maker, or other person involved in the underlying determination.

If an appeal does not meet one or more of the grounds for appeal set forth in this Policy, the appeal will be denied. Both parties will be notified simultaneously in writing of the denial and the rationale for the decision.

Any sanctions imposed as part of the determination will be stayed pending the outcome of the appeal.

Supportive measures may be continued, modified, or reinstated, as appropriate, in accordance with this Policy.

Appeals that satisfy one or more of the stated grounds will be reviewed by the Global Appeals Panel. Where an appeal raises new evidence that was not reasonably available at the time of the original determination, the matter may be remanded to the original Decision-maker for consideration of that evidence.

The appeal is limited to a review of the grounds asserted and is not a re-investigation of the complaint. The Global Appeals Panel may consult with relevant individuals as necessary but will not re-investigate the matter unless it determines that a procedural error, bias, or conflict of interest affected the outcome. If such a finding is made, the matter may be remanded for further investigation, a new hearing, or other appropriate proceedings.

A written Notice of Appeal Outcome will be provided simultaneously to both parties. The Notice will include the determination on each ground for appeal, the rationale for each decision, and any instructions for remand, reconsideration, or further proceedings. The Notice will also identify any sanctions or remedies that may be disclosed under applicable law.

The decision of the Global Appeals Panel is final and concludes Hult's internal grievance process.

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 are prohibited from engaging 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 involved in the grievance process, including Title IX staff, investigators, decision-makers, and hearing panel members if used, will receive appropriate training. Training covers recognizing and responding to allegations of discrimination, harassment (including hostile environment harassment), sexual misconduct, and retaliation; conducting impartial investigations; safeguarding confidentiality; and understanding the link between alcohol and drug use and sexual misconduct. This also includes mandatory annual training to maintain current knowledge of policy requirements and grievance procedures.

Hult requires annual training for faculty and staff that may be in contact with students on the topics of sexual harassment, discrimination, and related policy obligations. This is delivered through required online modules, supported by live or remote facilitated sessions at the start of each academic year.

Students receive required training on these policies, including available resources, support options, reporting pathways, and expected standards of conduct. This is delivered at orientation and intake sessions when a student starts their enrollment and is reinforced through a mandatory annual online training module.

In alignment with UK Office for Students Condition E6, Hult delivers annual E6 training and education through intake sessions, required annual online training, on-campus programming, and supplemental educational initiatives for students. Faculty and staff also complete annual E6-focused training through required online modules and additional training as appropriate.

Record Keeping

Hult will maintain for a minimum of seven (7) years records of all investigations, hearings, appeals, informal resolutions, supportive measures, training materials, and documentation demonstrating the basis for its actions and decisions under this Policy.

Policy Changes

This Policy supersedes previous policies addressing sex discrimination, sex-based harassment, sexual misconduct, and/or retaliation. Conduct will generally be addressed under the policy in effect at the time of the alleged incident unless otherwise required by applicable law. Hult reviews and updates this Policy regularly and reserves the right to make changes as necessary. Updated versions take effect upon posting online, and Hult will notify students of material changes.

If applicable laws, regulations, or court decisions change, this Policy will be interpreted and applied in accordance with the most current legal requirements.

This Policy does not create legally enforceable rights beyond those provided under applicable law.

External Complaints

If you have filed a complaint with Hult's Title IX staff and believe the response was inadequate, or if you believe you have experienced discrimination by the institution, you may file a complaint with external agencies, including but not limited to:

United States of America (USA)

U.S. Department of Education, Office for Civil Rights (OCR) – Boston Office
Telephone: (617) 289-0111 | Email: OCR.Boston@ed.gov | Website:
www2.ed.gov/about/offices/list/ocr/boston.html

U.S. Equal Employment Opportunity Commission (EEOC)

Enforces federal laws prohibiting employment discrimination based on race, color, religion, sex, national origin, age, disability, or genetic information.

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

United Kingdom (UK)

Equality and Human Rights Commission (EHRC)

Enforcement of the Equality Act 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)

Oversees institutional compliance, including complaints related to harassment and conduct

Website: <https://www.moe.gov.ae>

Student Non-Disclosure Agreement (NDA) Prohibition

Hult will not require students reporting harassment, sexual misconduct, sexual violence, discrimination, or retaliation to enter into non-disclosure agreements or confidentiality provisions that prevent discussion of their experiences, except where specifically requested by the reporting party and permitted by applicable law.