



LAUREATE
EDUCATION INC[®]

LAUREATE EDUCATION, INC.

EMPLOYEE HANDBOOK



LAUREATE
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INTRODUCTION

About This Handbook

This handbook is a resource to help you understand current Laureate Education policies. The pages are formatted to allow quick access to the information you need. Each policy is listed at the top of the page, followed by the purpose of the policy and the corresponding procedures and policy implications for employees, managers and Human Resources. We continually evaluate our policies and, from time to time, make improvements, changes, additions and deletions based on these evaluations. The most current version of this handbook is available online on www.MyLaureate.com, and any online updates supersede earlier hard copy versions. You should, therefore, consult the online version for current updates

The contents of this handbook, with the exception of the express at-will employment agreement, do not constitute the terms of a contract of employment, express or implied, or the guarantee of any benefits. This handbook should not be construed as a guarantee of continued employment.

It is not possible to explain every organizational policy, rule, practice or benefit in this handbook and how they apply to each employee. You should use this handbook as a first step toward answering questions about your job. If you cannot find an answer to a question, please feel free to consult your manager or Human Resources or use one of the other methods outlined in this handbook. We encourage your feedback and suggestions for improvements to this guide.

This employee handbook is for internal use only, and applies to all staff, both full- and part-time. Unauthorized use of the handbook is in violation of your Confidentiality Agreement and may result in corrective action, up to and including termination. The management of Laureate Education, Inc. reserves the right to review, revise, delete, and interpret the policies and procedures set forth in this handbook at its discretion without prior notice. This handbook supersedes all previous versions. Federal, state or local laws prevail in the event there is a conflict with the content of this guide.

Laureate reserves the prerogative as an employer, at any time, and without prior notice to:

- Establish, administer and change wages, benefits, policies, practices and procedures
- Take whatever other action is necessary in its judgment to operate, alter, grow, reduce, or close the business.

Terms Used in the Handbook

For the purpose of this handbook, “Laureate” refers to Laureate Education, Inc. and all its affiliated companies.

“Human Resources” generally refers to the Human Resources representative(s). “Manager” refers to any person in a position of supervising employees.

SECTION ONE

Employment at Laureate

HIRING PRACTICES AND EMPLOYMENT

EMPLOYMENT STATUS AND CLASSIFICATIONS

INTRODUCTORY PERIOD OF EMPLOYMENT

NEW HIRE ORIENTATION

EMPLOYMENT OF RELATIVES

Hiring Practices and Employment

Policy

Laureate seeks qualified candidates for all open positions. Applicants offered employment must successfully complete pre-employment processing before they can become Laureate employees. Laureate is an equal opportunity employer and conducts all business activities, including hiring, without regard to age, color, gender, disability, marital status, national origin, citizenship status, race, religion, sexual orientation, veteran status or other legally protected category.

Purpose

- To ensure that Laureate chooses the most qualified candidates for all open positions and promotions.
- To ensure consistency in the employment process by maintaining a set of standards for hiring.

Manager Responsibilities

- Review employment needs and strategies with Human Resources and obtain appropriate approvals before recruiting for a position.
- Develop a departmental budget for recruiting costs (in conjunction with Human Resources) to ensure the most effective search.
- Provide feedback to Human Resources on candidates reviewed.
- Know and understand Laureate's employment policy and learn to conduct lawful interviews.
- Complete the training class Selecting Great People prior to interviewing candidates.
- Work with Human Resources, when a final candidate is identified, to determine the specifics of the employment offer.
- Work with Human Resources, which will make the final offer using a standard letter or an approved modified letter.
- Work with Human Resources to ensure all new hire paperwork is complete.
- Ensure work station is set up and all required tools are ordered for new hire prior to first day of work.

Human Resources Responsibilities

- Partner with managers to review and plan employment strategies for exempt and non-exempt positions.
- Ensure that all Laureate employment policies are followed and that pre-employment processing steps have been completed.
- Source and identify the most qualified candidates.
- Use feedback from performance evaluations to validate hiring and selection procedures for internal candidates.

Pre-Employment Screening (Reference and Background Checks)

Offers of employment are contingent upon satisfactory reference, education verification, and background checks, as required. Employment may be denied or terminated if Human Resources, in consultation with management, receives a pre-employment screening report and determines that an issue in the report affects an individual's ability to do the job and/or the safety of the workplace. Job offers are contingent upon the successful completion of any required pre-employment screening.

New Hire Paperwork

The following forms must be completed and returned to Human Resources on or before the first date of hire:

1. Signed Offer of Employment Letter
2. Employment Application
3. Voluntary Affirmative Action Information Form
4. New Hire Information Sheet
5. I-9 Form
6. Confidentiality and Non-Disclosure and Covenant Not to Compete Agreement
7. Direct Deposit Election Form
8. W-4 Federal Tax Form (and state tax form if applicable)
9. Employee Handbook Acknowledgement Form
10. 401k Acknowledgement Form
11. Drug-Free Workplace Form

Employment Status and Classifications

Policy

Employment at Laureate is on an “at-will” basis, which means the employment relationship is for no definite duration and may be terminated at any time, by either the employee or Laureate, with or without cause or notice.

The contents of this handbook, with the exception of the express at-will employment agreement, do not constitute the terms of a contract of employment, express or implied, or the guarantee of any benefits. This handbook should not be construed as a guarantee of continued employment.

Laureate employees are classified as either regular full-time, regular part-time or temporary. Regular full-time employees are eligible to participate in Laureate’s benefits programs. Regular part-time employees are eligible for certain benefits.

Jobs are classified as either exempt or non-exempt, according to the Fair Labor Standards Act (FLSA). As noted earlier, all employees are at-will employees of Laureate and are governed by the policies in this handbook.

Purpose

- To determine if an employee is eligible for benefits and certain policy provisions.
- To comply with federal, state and local laws governing overtime pay.
- To keep current records of work schedules and benefits eligibility.

Categories of Employment

- **Regular Full-Time Employees** are regularly scheduled to work at least 30 hours per week and are eligible for benefits.
- **Regular Part-Time Employees** are regularly scheduled to work fewer than 30 hours per week and are eligible for certain benefits.
- **Temporary Employees** are on the Laureate payroll, but are employed for a specific temporary period of time, usually no more than 90 days.
- **Independent Consultants** have a written contract with Laureate, are paid by submitting an invoice, and are hired for a specific project, generally not more than six months in length. These arrangements must meet strict guidelines and are not to be entered into without prior approval from Human Resources.
- **Non-Exempt Employees** are typically paid on an hourly basis and are eligible for overtime pay.
- **Exempt Employees** are typically paid on a salaried basis for carrying out their position responsibilities regardless of the hours worked and are not eligible for overtime pay.

All employees are at-will employees.

In addition to the above categories of employees, Laureate will occasionally retain the services of **Temporary Agency Employees (Temps)**. Temps are employed by their respective agency and are in no way considered employees of Laureate.

Employee Responsibilities

- Know their employment classification and how it relates to their benefits, overtime eligibility and time off.
- Understand how a change in status will affect their benefits, overtime eligibility and time off.

Manager Responsibilities

- Know their employees' employment classifications and ensure compliance with overtime requirements.
- Ensure that employee work schedules conform to their employment classifications.
- Notify Human Resources and complete the appropriate paperwork before changing an employee's employment classification.
- Work with Human Resources representatives to secure approval to hire an independent consultant and make appropriate arrangements for the consultant's term of service.
- Work with Human Resources to secure a temporary contract employee.

Human Resources Responsibilities

- Classify all positions as either exempt or non-exempt, in accordance with appropriate fair labor standards requirements.
- Review independent consultant arrangements.
- Review temporary contract agency agreements for compliance with Laureate policy.

Introductory Period of Employment

Policy

The introductory period of employment is the first 90 days on the job. Employees who leave during the introductory period are not eligible for payment of vacation benefits, except as required by state law. Neither this introductory period nor the successful completion of the introductory period of employment changes the “at-will” employment relationship with Laureate.

The introductory period may be extended if there is a need for additional time to assess performance. Managers should consult with Human Resources before extending the introductory time period, and employees should be informed in writing of the extension.

Purpose

- To allow employees time to decide whether the job is right for them.
- To allow managers the opportunity to decide whether employees are right for the job.

Employee Responsibilities

- Learn about Laureate, its mission and the new position.
- Ask their managers questions to ensure that they understand departmental and job expectations.
- Meet job responsibilities and expectations.

Manager Responsibilities

- Help new employees understand and meet job responsibilities during the introductory period of employment.
- Discuss performance issues as they occur and give employees specific details on how to improve performance.
- Consult Human Resources when dissatisfied with employee performance during the introductory period.
- Assess employee performance just before the end of the introductory period of employment and document employee strengths and development areas in writing. Discuss this with employees and forward documentation to Human Resources.

Human Resources Responsibilities

- Assist managers in assessing an employee’s first 90 days of employment.

New Employee Orientation

Policy

All newly hired employees are required to participate in an orientation process directed by Human Resources.

Purpose

- To provide new employees with clear, accurate and consistent information about what is expected of them in their new positions.
- To help new employees perform their jobs successfully.
- To educate new employees about Laureate's policies, benefits, history, structure and mission.
- To welcome new employees to the Laureate team.

Employee Responsibilities

- Participate actively in the orientation by asking questions, reading, adhering to the policies and soliciting performance feedback.
- Seek training when needed.
- Ask questions about processes or policies that seem unclear.
- Continue to learn about and grow with Laureate throughout their employment.
- Meet their manager's expectations throughout the orientation process and the introductory period.

Manager Responsibilities

- Familiarize new employees with the department, introduce co-workers, give a tour of the work area and explain departmental procedures.
- Explain pay procedures and timing, referring to this employee handbook for assistance.
- Ensure that each employee has accurate information about policies, benefits, resources and employee services (including a copy of, or access to, this handbook).

Human Resources Responsibilities

- Develop and, where possible, conduct orientation programs.
- Answer benefits or policy questions for managers and new employees.
- Provide written orientation materials, such as this handbook.

Employment of Relatives

Policy

Relatives employed at Laureate may not be in any direct or indirect supervisory relationship to each other; nor may they be placed in any position that creates an actual or potential conflict of interest. For example, having influence over the salary or promotional opportunities of a relative constitutes a conflict of interest. The department manager and Human Resources must approve work assignments of related employees.

For the purpose of this policy, relatives include spouse, parent, child, brother, sister, aunt, uncle, niece, nephew, cousin, in-laws (brother, sister, father, mother, son, daughter), domestic partner or other relationships that may create a conflict of interest.

Purpose

- To ensure that the most qualified candidates are chosen for all open positions and promotion opportunities.
- To minimize potential disruptions resulting from close personal relationships.

Employee Responsibilities

- Notify their supervisors regarding any existing relationship with another employee that is covered by this guideline or any change in such a relationship.
- Discuss potential conflicts of interest with their manager.

Manager Responsibilities

- Review employment arrangements to determine if supervisory relationships exist between relatives. Contact Human Resources if a conflict of interest does (or could) exist.
- Reserve the right to determine what action, if any, is necessary to correct the conflict (or appearance of conflict) of interest.

Human Resources Responsibilities

- Review and approve all work assignments involving relatives.
- Assist with reassignment of employees, due to conflict of interest, if appropriate.

SECTION TWO

Our Work Environment

EQUAL EMPLOYMENT OPPORTUNITY

HARASSMENT/SEXUAL HARASSMENT

ETHICS / CORPORATE GOVERNANCE

CONFLICTS OF INTEREST

FERPA POLICY

CONFIDENTIALITY AND EXTERNAL INQUIRIES

REFERENCES

SMOKE-FREE ENVIRONMENT

LOSS PREVENTION
EMERGENCY POLICY

SUBSTANCE ABUSE

SOLICITATION AND DISTRIBUTION

COMPANY PROPERTY

Equal Employment Opportunity

Policy

Laureate is an equal opportunity employer and conducts all business activities without regard to age, color, gender, disability, marital status, national origin, citizenship status, race, religion, sexual orientation, veteran status or other legally protected categories.

Discrimination based on these characteristics is prohibited. In addition, retaliation against any employee for raising good faith concerns under this policy is prohibited.

This policy covers the following areas:

- Hiring
- Release from employment
- Promotions
- Transfers
- Compensation
- Benefits
- Education/training
- Business-related social activities
- All other business activities

Any questions about Laureate's employment practices or any complaints from outside agencies should be immediately directed to Human Resources.

Purpose

- To provide equal opportunity for all employees.
- To attract and retain a talented, diverse work force.
- To ensure that all employment practices are conducted with regard to job-related factors only.
- To comply with applicable federal, state and local laws against discrimination.

Employee Responsibilities

- Contact Human Resources immediately if they feel they (or others) have experienced discrimination, harassment or retaliation.
- Cooperate fully with Human Resources in investigations of alleged discrimination, harassment or retaliation issues, maintaining the confidentiality of the process .

Manager Responsibilities

- Maintain an environment free of discrimination, harassment and retaliation.
- Contact Human Resources immediately if an employee complains of discrimination, harassment or retaliation.
- Work in conjunction with Human Resources when investigating complaints of discrimination, harassment or retaliation, maintaining confidentiality as appropriate.

Human Resources Responsibilities

- Offer management tools to help maintain a work environment free from discrimination, harassment and retaliation.
- Work in conjunction with managers to investigate complaints of discrimination, harassment or retaliation, maintaining confidentiality as appropriate.
- Consult with management regularly regarding equal opportunity employment.

Harassment/Sexual Harassment

Policy

Laureate prohibits harassment, sexual harassment and retaliation in the workplace, whether committed by managers, co-workers, customers/students or third parties. Harassment based on an individual's age, color, gender, disability, marital status, national origin, citizenship status, race, religion, sexual orientation, veteran status or other legally protected categories is prohibited.

Sexual harassment includes, but is not limited to:

- Unwelcome sexual advances
- Demands/threats for sexual favors or actions
- Sexual pictures or objects
- Suggestive gestures, sounds or stares
- Unwelcome physical contact
- Inappropriate and/or unwelcome email, electronic correspondence (IMs & text messages), jokes, comments or innuendoes of a sexual nature
- Obscene or harassing phone calls

Conduct of this type directed at others based on any protected characteristics is prohibited. Intentionally making false accusations or retaliating against employees who bring a complaint against managers or co-workers are also prohibited and may result in action, up to and including termination.

Purpose

- To provide a productive workplace free of harassment/sexual harassment and retaliation.
- To ensure that employees have a work environment where they feel safe and comfortable.

Employee Responsibilities

- Conduct themselves in a manner that does not violate Laureate's harassment/sexual harassment policy.
- Contact Human Resources immediately if they believe they have been subjected to harassment/sexual harassment or retaliation. (All incidents will be investigated promptly, and corrective action will be administered when appropriate.)
- Report to their manager or Human Resources any and all harassment/sexual harassment and retaliation they believe has occurred against themselves or other employees.
- Cooperate fully with Human Resources if they are involved in harassment/sexual harassment or retaliation investigations. (Confidentiality will be maintained to the extent possible.)
- Maintain confidentiality with all aspects of the investigation.

Manager Responsibilities

- Conduct themselves in a manner that does not violate Laureate's harassment/sexual harassment policy.
- Maintain a work environment free of harassment/sexual harassment and retaliation.
- Report all incidents of harassment/sexual harassment or retaliation concerning their employees or any other employees.
- Contact Human Resources immediately for assistance in investigating and resolving any suspected harassment/sexual harassment or retaliation.
- Initiate corrective action, up to and including termination, if they are aware of or suspect harassment/sexual harassment or retaliation.
- Maintain confidentiality with all aspects of the investigation.

Human Resources Responsibilities

- Work with employees and managers to investigate and resolve complaints of harassment/sexual harassment or retaliation.
- Be available to give advice on handling situations where inappropriate behavior is apparent or suspected.
- Ensure that this policy is applied consistently.

Ethics/ Corporate Governance

Laureate Education is proud of its reputation for its culture of accountability and strong adherence to ethical business practices. To support and enhance this reputation, Laureate Education has established a Corporate Governance Hotline for employees.

Purpose

- The Corporate Governance Hotline is primarily designed for employees to report concerns about deceptive accounting, operational reporting, or auditing procedures, as well as to report other types of fraud.
- This hotline is for Laureate Education’s employees to anonymously report possible violations of Laureate Education’s Corporate Ethics and Governance Policies and any financial impropriety by employees at any level. Hotline messages are completely confidential – once recorded, the message is distorted for privacy protection.
- The confidential hotline messages are sent to the Laureate Education Audit Committee Chairperson and General Counsel for investigation.

Employee Responsibilities

- Employees must understand and periodically review Laureate Education’s Corporate Ethics and Governance Policies. These policies can be found on www.MyLaureate.com. If you work outside the United States, the policies can be found on your organization’s local intranet site.
- Employees are expected to immediately report concerns by registering a confidential report at the following phone number:
US: 800-249-5744
International 678-999-4548 (Country Code 001 for US)
Webform URL: <https://laureate.silentwhistle.com>
- Personal and professional difficulties with managers and other employees should be addressed by your supervisors, as appropriate. Always report instances of possible discrimination or harassment to the Human Resources Department and/or your supervisor immediately. Please consult the Equal Employment Opportunity and Non-Harassment policies in this handbook.

Manager Responsibilities

- Promote an ethical work environment and employee compliance with Corporate Ethics and Governance Policies by all employees.
- Ensure the confidentiality of the Corporate Governance Hotline and prohibit all forms of retaliation by employees or management against any employee making any submission.

Human Resources Responsibilities

- Ensure employee awareness of Corporate Ethics and Governance Policies.

Conflicts of Interest

Policy

Employees are expected to observe the highest standards of business ethics. Accordingly, employees are not permitted to accept gifts, cash or favors from customers or suppliers or to engage in business for their own benefit that conflicts with Laureate's business interests.

Examples of ethical concerns are:

- Operating your own business making use of Laureate resources or competing with Laureate's business
- Sharing confidential company information
- Dating someone who reports to you or is in a department you supervise

For more information, please refer to the Employment of Relatives Policy in Section One of this handbook and Corporate Ethics and Governance Policies, and Confidentiality and External Inquiries Policies in this section.

Purpose

- To ensure that employees are objective and non-biased in their judgments.
- To avoid situations where personal or business interests may conflict or appear to conflict with the interests of Laureate or our customers/suppliers.

Employee Responsibilities

- Employees are responsible for avoiding actual or potential conflicts of interest.
- Employees who have any ethical concerns should consult with their manager or Human Resources representative. Employees can be assured that there are no penalties for raising ethical concerns.
- Employees should always adhere to our Confidentiality and External Inquiries Policy and be cautious about the information they discuss with anyone outside of the company.
- **If you have questions....ASK your manager or Human Resources representative.**

Manager Responsibilities

- Encourage employees to avoid actual or potential conflicts of interest. If a manager thinks a conflict of interest exists, he or she can consult appropriate levels of management and Human Resources.
- Administer any appropriate corrective action, up to and including termination, for those in violation of this policy.
- **If you have questions....ASK your manager or Human Resources representative.**

Human Resources Responsibilities

- Review any reports concerning conflicts of interest and investigate, if necessary, with the appropriate parties.
- Answer questions on matters concerning potential conflicts of interest in consultation with the Legal Department and help employees determine if a conflict exists.

Confidential Information Protection Policy

Policy

All Laureate Education employees, faculty, contractors and consultants are required to protect Confidential Information (as defined below) from unauthorized disclosure, loss, theft or duplication at all times and all locations – be it at work, home, or while on travel. All employees must sign a “Confidentiality and Non-Disclosure Agreement and Covenant Not to Compete” before beginning employment.

I. Confidential Information

Information that is critical to the business and protected from unauthorized access which Laureate has a contractually binding, legal, regulatory, business or ethical obligation to protect. **Confidential information must be stored only on protected department share folders, with access restricted to only those employees who need such access to complete an approved task. It must never be stored on local drives or removable media, unless authorized by a manager.**

Confidential Information includes:

a. Personally Identifiable Information (PII)

PII refers to any information that identifies or can be used to identify, contact, or locate a person including: identification numbers (SSN), name, address, telephone numbers, fax numbers, e-mail addresses, driver’s license numbers, license tag numbers, credit card numbers, and finger prints. Unauthorized access could damage the reputation and public trust of the company and theft or loss of the information could result in the identity theft of employees, students, or contractors, which could cause significant financial hardship for both the company and affected parties.

b. Business Proprietary

Business proprietary information includes, but is not limited to, system passwords, acquisition/merger information, and information relating to past, present or future products, software, financial information, customer lists, student information, marketing techniques and strategies, plans and materials, pricing policies, trade secrets consisting of formulae, processes, patterns, copyrighted, trademarked and patented materials, devices and compilations of information, records and specifications which are owned by Laureate. Business Proprietary information can take many forms, including but not limited to corporate memos, contracts, the employee handbook, presentations, printouts, faxes, data stored in applications and data accessible from the MyLaureate Web site. Unauthorized release could influence the company's operational effectiveness, cause a material financial loss, provide a significant gain to a competitor, or cause a major drop in customer confidence.

Business Proprietary information includes confidential information coming to Laureate from our business partners and includes, but is not limited to, contractor PII, data covered by non-disclosure agreements, signed contracts, and sales quotes. Unauthorized access or disclosure of this information could violate contractual and other legal obligations and, good business practices..

c. Employee Confidential

Employee confidential information includes: employee PII, compensation, data collected for benefits, bank account routing numbers, office location, and office telephone extension. Unauthorized access or disclosure of this information could violate federal, state, or international privacy laws and regulations.

d. Student Confidential

Student confidential information includes: student PII, all individually identifiable student information such as, admission materials, school designation, courses taken, grades, test scores, credit card data, financial aid information, medical and disability records, disciplinary actions, advising records, and educational services received. Data from potential prospects and alumni PII are also considered student confidential information. Unauthorized access or disclosure of this information could violate federal, state, or international laws and regulations such as FERPA (Federal law designed to protect the privacy of student's education records), HIPPA (Federal law designed to protect the privacy of health records), or EU Data Protection Directive. This data cannot be disclosed without the authorization of the Registrar, and in certain cases, the explicit approval of the student.

Purpose

- To provide guidelines on the processing, storage and transmission of confidential information and to ensure that this information is appropriately protected from modification or unauthorized disclosure.
- To ensure the security of confidential information by preventing its potential unauthorized release.
- To ensure that all employees, faculty, and contractors adhere to federal, state, and international guidelines relating to the handling of documents, printouts, and faxes.

Employee Responsibilities

- Store documents that contain confidential or internal information only in departmental share folders. Never store confidential information on local drives or removable media (e.g. USB flash drives, external hard drives, flash cards, PDAs, CDs, DVDs, etc., unless authorized by a manager.
- Do not share computer accounts and passwords.
- Confidential information must never be stored, printed or faxed to an insecure location. Documents, printouts, and faxes containing confidential information must be shredded or stored in a secure (locked) location.
- Remote access to confidential information must be accomplished only through a secure VPN.
- Confidential information sent to third parties must be transferred in a secure manner. Files should be password protected and encrypted. The transport method must be encrypted (e.g. sftp, https, vpn, etc).
- If you must transport confidential or internal information via a mobile laptop, PDA, or removable media, then you must notify your manager and receive approval prior to handling the data.
- Report the potential loss or theft of sensitive data to your manager immediately.
- Do not send via internet, post, or fax, any data outside the company without first ensuring that sending such information will not compromise Laureate's Confidential Information. If you are unsure, check with your manager for assistance and approval.
- Sign a "Confidentiality and Non-Disclosure Agreement and Covenant Not to Compete" and forward it to Human Resources.

Manager Responsibilities

- Understand what confidential information is handled by your employees.
- Inform employees of the information protection policies.
- Instruct employees on the proper method to handle and store confidential information.
- Verify employees have appropriate access to information as may be required for the essential duties of the employee's position.
- Verify that permissions on file server folders are appropriate. Contact the help desk for further assistance and approvals.
- Report the potential loss or theft of sensitive data to Security Architect immediately.
- Ensure that each employee signs a "Confidentiality and Non-Disclosure Agreement and Covenant Not to Compete" and forward it to Human Resources.
- Conduct periodic checks of work areas to ensure that employees are observing Laureate standards for safeguarding confidential information.
- Consult with the Security Architect (security.architect@laureate-inc.com) prior to approving storage of confidential information on local drives or removable media.

Human Resources Responsibilities

- Place the signed "Confidentiality and Non-Disclosure Agreement and Covenant Not to Compete" in each employee's file.

FERPA Policy

Policy

As institutions focused on higher learning, Laureate-operated universities have legal and ethical obligations to protect the personal information of our students by abiding by the Family Educational Rights and Privacy Act (FERPA) policy. Laureate employees must follow FERPA guidelines when communicating with students, faculty and outside agencies or persons.

FERPA affords students certain rights with respect to their academic records. These rights include:

- The right to inspect and review the student's education records within 45 days of the day the university receives a request for access
- The right to request the amendment of the student's academic records, which the student believes are inaccurate or misleading
- The right to consent to disclosures of personally identifiable information contained in the student's education records (except to the extent that FERPA authorizes disclosure without consent)
- The right to file a complaint with the U.S. Department of Education concerning alleged failures by the university to comply with the requirements of FERPA
- The right to specify that the student's directory information may not be released by the university

Purpose

- To protect students' rights to privacy.
- To follow federal guidelines relating to student information.
- To ensure student information is not released without proper authorization from Registrar's Office and the student.

Employee Responsibilities

- Know what the FERPA policies are in relation to student information.
- Follow FERPA guidelines when communicating with students, faculty and outside agencies or persons.
- Check with the Registrar regarding any FERPA-related questions.
- Complete the mandatory FERPA training within their first 30 days of employment.
- Complete the acknowledgement of participation for the FERPA training module.

Manager Responsibilities

- Know what the FERPA policies are in relation to student information.
- Inform employees of FERPA policies.
- Follow FERPA guidelines when communicating with students, faculty and outside agencies or persons.
- Check with the Registrar regarding any FERPA-related questions.
- Ensure all employees have participated in the mandatory FERPA training and have completed their acknowledgement form.

Human Resources Responsibilities

- Ensure that this policy is applied consistently.

External Inquiries

Policy

Refer all media calls, external requests for information, and corporate-related inquiries to Corporate Communications. Refer all inquiries from lawyers, law enforcement officials and federal, state or local government agencies to the Laureate Legal Department.

Purpose

- To ensure accurate, consistent, and appropriate media coverage of Laureate's products, services and employees.
- To facilitate timely response to media and legal inquiries.

Employee Responsibilities

- Refer all media inquiries to the Vice President of Corporate Communications.
- Refer all inquiries from attorneys to the Laureate Legal Department.
- Refer all inquiries from law enforcement officials and federal, state or local government agencies to the Laureate Legal Department.
- Never provide information to anyone outside of the Company without approval.

Manager Responsibilities

- Remind employees of Laureate's confidentiality policy and the process for handling media requests and legal inquiries when making important organizational announcements.

References/Verifications

Policy

Inquiries about current and former employees should be referred to Human Resources. Laureate verifies only factual information that can be objectively substantiated, such as dates of employment, position title and salary. Laureate will not release other information about current or former employees without their written consent. This policy applies to requests for references or recommendations made through social networking sites. Employees may not act as a reference for or make a recommendation of another person (even without identification of Laureate) on a social media site.

Laureate provides information to credit agencies only with the written consent of the employee. Managers may not give any reference information on their employees. Refer all reference requests to Human Resources.

Purpose

- To ensure that factual and accurate information about current and former employees is provided to outside agencies.
- To ensure that legal guidelines are being followed according to federal, state and local laws.

Employee Responsibilities

- Forward all reference requests directly to Human Resources.
- Make sure that written consent forms have been completed and returned to the appropriate agencies.

Manager Responsibilities

- Forward all reference requests directly to Human Resources.
- Help employees understand the process for obtaining a reference.

Human Resources Responsibilities

- Ensure that a written consent form has been received prior to providing a reference.
- Provide accurate and factual reference information on current and former employees.
- Maintain accurate records on current and former employees.

Smoke-Free Environment

Policy

Smoking is prohibited inside Laureate facilities. All employees and visitors are expected to comply with our smoking policy. There are designated smoking areas for each location for employees to use on breaks and before or after work hours.

Purpose

- To provide a healthy work environment for our employees and faculty.
- To comply with regulations governing a smoke-free workplace.

Employee Responsibilities

- Refrain from smoking in Laureate's facilities.
- Limit use of designated smoking areas to breaks and before or after work hours.
- Follow the directive at your work location.

Manager Responsibilities

- Notify employees of Laureate's smoke-free environment policy.
- Enforce the no-smoking policy in areas directly under their control.
- Utilize corrective action for violations of this policy.

Human Resources Responsibilities

- Ensure that this policy is applied consistently.

Loss Prevention

Laureate will not be liable for the loss, theft or damage of any personal property brought onto our premises, or for fire, theft, damage, or personal injury involving employee automobiles, their contents or occupants. Laureate reserves the right to inspect and search all areas of Laureate premises at any time without notice and to question individuals on our premises concerning safety and/or security matters.

A Word About Security Inspections

The safety and security of Laureate's property and premises is important to all of us. Our facilities contain valuable property, student files, information and trade secrets that we all have an obligation to protect. Therefore, we must have immediate access to all company files and property and must also retain our ability to promptly locate missing property and investigate suspicious activities at our facilities.

Security inspections, searches and investigations can include, without limitation: examining offices, computers, CDs, disks, files, file cabinets, desks, closets, storage areas, lockers, restrooms, and all other areas of our facilities and premises, as well as the person, vehicles, purses, packages, parcels and other containers of individuals entering, leaving or located on company property. We may conduct these investigations, inspections and searches when reasonably warranted as determined by Laureate. For these reasons, Laureate keeps duplicates of all keys issued to Laureate employees.

Your assistance with our efforts to provide for your and Laureate's security—including your authorization to conduct security inspections or cooperation with company security inspections—is expected as a condition of your continued employment and is greatly appreciated.

Purpose

- To ensure the safety and security of Laureate property, premises, employees, and student information.

Employee Responsibilities

- Strive to maintain the security of all Laureate equipment.
- Check all equipment properly before use.
- Report any suspicious activity they observe on Laureate property to their supervisor or Human Resources.
- Leave valuables at home.
- Place all personal belongings in a safe and preferably locked area.

Manager Responsibilities

- Obtain approval from Human Resources prior to any inspection.
- Authorize the removal of company property, such as laptops, as dictated by departmental needs and ensure all property is properly returned.

Human Resources Responsibilities

- Review and approve all security inspections.

Emergency Policy

When in doubt, dial 911.

In a time of an emergency, Laureate businesses will utilize the Emergency Communications Hot Line **877-559-1635** to communicate any significant impacts to the business.

If the office is officially closed on a scheduled workday, regular employees will be paid for the entire day. .

Toll Free Number: 1-877-559-1635

Alternate Number: 410-637-4490 (for International calls, dial code {001 for US} before dialing the number)

Internal Number: 69181

Purpose

- To inform Laureate employees of emergency situations that may impact their ability to perform essential work functions.
- To promote the safety of our employees, visitors and clients.
- To establish a system for announcing closure due to an emergency situation.

Employee Responsibilities

- Understand and use the emergency situation notification process. Follow emergency preparedness protocol as directed by their manager.
- Report to work if Laureate is open and unaffected by an emergency situation.
- Call their manager if they independently decide not to come to work and indicate if they are using a vacation day, floating holiday or taking an unpaid day.

Manager Responsibilities

- Inform employees of the emergency communication notification process.
- Establish and communicate an emergency preparedness protocol for their employees to follow so that they are informed about emergency situations that may impact their safety and/or ability to perform their job.
- Ensure that employees who take days off on their own volition are charged with a vacation day, floating holiday or unpaid day.
- Inform employees if the decision to close is made during a workday. Those who report to work should be paid for the entire day.

Human Resources Responsibilities

Ensure that this policy is applied consistently.

.Human Resources is responsible for establishing and communicating a system to inform employees of emergency situations.

Substance Abuse

Policy

Laureate maintains a drug-free workplace. Employees are strictly prohibited from misusing controlled substances, intoxicants, alcohol and prescription drugs, or buying, selling, manufacturing, distributing, possessing or working under the influence of those substances when conducting Laureate business, except as explicitly authorized by a prescription from a physician.

The employee assistance program Business Health Services (BHS) can help employees and their families with substance abuse (and other) issues. For assistance, call 800-765-3277.

Purpose

- To maintain a healthy and productive work environment, unimpaired by substance abuse.
- To prevent accidents and injuries.

Employee Responsibilities

- Sign the Acknowledgement of a Drug Free Workplace during the onboarding process.
- Know the policy. Understand that employees who violate this policy are subject to corrective action, up to and including immediate termination.
- Contact their manager if they are aware of illegal activity on Laureate property.
- Cooperate fully with Human Resources if they are involved in substance abuse investigations. (Refusal to cooperate in an investigation may result in corrective action, up to and including termination.)
- If an employee voluntarily admits substance abuse prior to disciplinary action, the company may require the employee to seek counseling through the employee assistance program.
- Remain drug/alcohol free and cooperate in periodic substance abuse testing if they are undergoing treatment. (Employees who are referred for treatment and don't remain drug/alcohol free and/or perform unsatisfactorily on the job may be subject to termination).

Manager Responsibilities

- Contact Human Resources if an employee is suspected of misusing controlled substances, intoxicants, alcohol, or prescription drugs or of buying, selling, manufacturing, distributing, possessing or working under the influence of such substances.
- Administer the appropriate corrective action, up to and including termination, for those who violate this policy.
- Work with Human Resources if a substance abuse problem exists.
- Refer employees to the employee assistance program in appropriate circumstances.

Human Resources Responsibilities

- Work closely with employees, managers and the employee assistance program to resolve substance-abuse issues and monitor situations.
- Conduct investigations, in conjunction with managers, of alleged substance abuse.
- Communicate policy in New Employee Orientation.

Solicitation and Distribution

Policy

Laureate prohibits the soliciting of employees and the distributing of non-business material in work areas and during work hours. Laureate bulletin boards, internal directories, interoffice mail, email and other company resources are to be used only for business purposes.

Employees may not solicit or distribute **any** information in work areas on behalf of a business, club, school, society, labor union religious group, nonprofit organization or political party during working time or during the working time of the employee(s) to whom such activity is directed.

Laureate reserves the right to sponsor certain events such as The United Way campaign.

Purpose

- To avoid disruption of business activity.
- To ensure that employees are not made to feel obligated or pressured by solicitation or distribution at work.
- To ensure that non-employees do not solicit or distribute written materials on Laureate property.

Employee Responsibilities

- Understand this policy. Employees violating the policy will be subject to corrective action, up to and including termination of employment.
- Refer any request from an employee or outside organization to sell merchandise, solicit contributions, or distribute material to Human Resources.

Manager Responsibilities

- Monitor work areas for unauthorized distributions or solicitation. Remove unapproved material from work areas and initiate corrective action.

Human Resources Responsibilities

- Review company bulletin boards and other company communication sources to ensure appropriate use.
- Approve materials to be posted on company bulletin boards and in other work areas.

Company Property

Policy

Laureate property is not for personal use and may not be removed from company premises without permission. Laureate reserves the right to access and search all company property and equipment. Computer systems, telephone systems, email and voice mail are for business purposes only and will be monitored, as appropriate. In accordance with the payroll deduction authorization signed by all new employees, and to the extent permitted by law, Laureate reserves the right to deduct from an employee's paycheck for material not returned when an employee leaves the company and/or for the amount of personal telephone calls, if any, charged to Laureate.

University and company property includes, but is not limited to:

- Manuals
- Records
- Test materials
- Office supplies
- Email documents (IM)
- Computer hardware
- Software and pass codes
- Cellular phones
- Internet software and access
- Furniture
- Lockers
- Owned and leased building space.

Laureate reserves the right to review employee computer disks, voice mail and email. Misuse of these systems is grounds for dismissal.

Purpose

- To protect Laureate property from misuse.
- To maintain the confidentiality of proprietary information.
- To give managers the ability to monitor employee performance and productivity.
- To deter illegal conduct and improper use of company property.

Employee Responsibilities

- Use company property for business purposes only, and act in a manner that does not result in personal gain or adversely affect Laureate.
- Ask their managers for approval before removing any company property from the premises.
- Return all company property to their manager (or designee as indicated by the manager) when leaving Laureate.

Manager Responsibilities

- Conduct periodic checks to ensure that company property is not being misused.
- Administer corrective action, up to and including termination, for violating this guideline.
- Collect all company property from employees leaving Laureate.

Human Resources Responsibilities

- Be present during property or equipment searches.
- Have employees sign authorization to deduct from their final paychecks.

SECTION THREE

On the Job

WORK HOURS

ATTENDANCE AND PUNCTUALITY

PERFORMANCE MANAGEMENT

CORRECTIVE ACTION

ISSUE RESOLUTION PROCESS

OUTSIDE EMPLOYMENT

EMPLOYEE FILES

JOB POSTING

DRESS POLICY

INCLEMENT WEATHER

VOLUNTARY TERMINATION

Work Hours

Policy

An employee's hours depend on his or her position and location. Work hours are communicated by managers and are subject to change based on business needs. Changes in work schedules will be announced as far in advance as possible. Laureate supports flexible work arrangements when mutually beneficial to the employee and the company.

Purpose

- To ensure that Laureate employees are available to meet the needs of their business unit.
- To allow employees to plan personal and professional responsibilities around their work schedule.

Employee Responsibilities

- Report to work at their scheduled start time.
- Know and understand the attendance/punctuality policy as it relates to the scheduled start time.
- Adjust to work schedule changes as needed.
- Make the necessary arrangements to work additional hours, if overtime is required.
- Record their work time (non-exempt employees) on eTime sheets accurately.

Manager Responsibilities

- Consult with the next level of management and Human Resources if they wish to change their employees' work schedules.
- Give employees as much notice as possible if they change work schedules and/or require their employees to work overtime.
- Understand state and federal laws regarding time and attendance requirements.
- Do not encourage or allow employees to work "off the clock."

Human Resources Responsibilities

- Ensure that this policy is applied consistently.
- Understand state and federal laws regarding time and attendance requirements.

Attendance and Punctuality

Policy

After accepting employment with Laureate, employees are responsible for being on duty, on time, every day they are scheduled to work. Excessive absences, tardiness and early departures will not be tolerated. All employees are expected to strive for perfect attendance. Attendance is part of the employee performance review.

It is important that employees call their manager **each** day they will be absent before their scheduled shift. Employees must tell their manager if they have a legitimate need to be away from work. No absence is automatically excused.

Purpose

- To provide our clients/students with the best service.
- To be fair to employees who are regularly at work and on time.

Employee Responsibilities

- Know their attendance requirements and manage their attendance responsibly.
- Call their managers prior to their scheduled work time **each** day they are unable to report to work. Employees should speak directly with their managers and indicate when they plan to return to work. A call from a family member or friend is only appropriate in an emergency.
- Request prior approval from their manager for scheduled time off.
- Call their managers when it becomes necessary to leave early or have some other unscheduled time off.
- Provide a medical slip signed by their health-care provider for absences of three days or more, and possibly in other situations.
- Document accurately any exceptions to their scheduled shift.
- Understand that sick days are not an entitlement. (Laureate may deem that an employee has excessive absences even if there are sick days remaining. Factors such as patterns of absence, timing of absence and number of absences may be considered.)

Manager Responsibilities

- Inform employees of attendance and punctuality requirements.
- Provide a reasonable procedure for reporting unscheduled absences and instruct employees on that procedure.
- Address attendance and punctuality issues as they occur and keep accurate and complete records.
- Review and approve (or deny) requests for time off and complete the appropriate forms for Payroll.
- Monitor attendance and punctuality and implement corrective action if necessary.

Human Resources Responsibilities

- Work with managers to determine when corrective action, up to and including termination, is appropriate.
- Apply this policy so that it complies with Laureate's policies on family and medical leave and other legal requirements.
- Ensure that this policy is applied consistently.

Performance Management

Policy

Performance refers to work performance, attendance and punctuality, conduct, and compliance with policies and procedures. Employee performance is the key to achieving business results and organizational productivity. Laureate uses informal and formal performance feedback tools to assist employees in developing high levels of performance.

A 90-day review may be given to new employees. A formal performance review should generally be conducted annually. A review is not a guarantee of a salary increase. Salary adjustments depend on performance and other factors. Laureate's "Common Review Date" for performance evaluations and compensation review is March 1.

Purpose

- To provide informal and formal opportunities for employees to receive feedback on performance.
- To help employees improve their skills and achieve Laureate objectives.

Employee Responsibilities

- Be proactive in soliciting performance feedback and guidance from their managers and peers.
- Work to improve performance and make an effort to solicit coaching and assistance from their manager.
- Complete the self evaluation for the performance review process as applicable.
- Participate in their annual performance evaluation with their manager.
- Read and comment in writing (if desired) on their evaluation.

Manager Responsibilities

- Explain performance expectations to their employees for positions and communicate job responsibilities and objectives.
- Provide ongoing opportunities for informal performance feedback through coaching and one-on-one discussions. Be consistent and praise in earshot of others, while asking for improvement in private.
- Complete and discuss annual performance evaluations—including the individual's strengths, areas for improvement, and developmental plans—with their employees.
- Give a copy of the completed performance review to the employee and file the signed original in the employee's personnel file located in Human Resources.
- Work with HR to formulate salary increase recommendations.
- Counsel employees on improving performance.
- Identify training needs as needed.
- Determine if job description accountabilities are still current.

Human Resources Responsibilities

- Assist managers in providing annual performance evaluations.
- Support managers in developing effective ongoing tools for performance feedback.
- Determine if more frequent reviews are appropriate.
- Identify employees for possible promotion.
- Use performance evaluations as input into the salary decision-making process.

Corrective Action

Policy

Laureate employees are expected to meet certain standards of work performance and conduct. These include, but are not limited to, those outlined in this handbook. Employees who do not meet the standards and expectations may be given the opportunity to improve performance and/or conduct through the corrective action process, where appropriate, given the circumstances. The nature of the corrective action used, up to and including immediate termination of employment, will depend upon the conduct of the employee and the relevant circumstances as determined at the discretion of Laureate. Corrective action is not a guarantee of continued employment. Employees are expected to meet their performance expectations daily.

Purpose

- To help employees and managers resolve performance and conduct issues.
- To provide employees with an opportunity to correct performance issues, where appropriate.
- Forms of corrective actions include but are not limited to:
 - Verbal counseling
 - Corrective Action Statement
 - Improvement Plan
 - Probation
 - Suspension (with or without plan)
 - Termination of employment
- If an employee fails to meet the company's expectations and standards, and corrective action is considered appropriate, Laureate can use any, some, or none of these forms of corrective action, including immediate termination of employment, as determined appropriate in its discretion.

Employee Responsibilities

- Understand and meet the performance standards and conduct expectations of their position.
- Discuss potential issues or challenges with their manager, Human Resources, or the Business Health Services (BHS) program.
- Take advantage of the corrective action process.
- Take responsibility for their performance and conduct and work to correct their behavior.
- Speak directly to their manager or Human Resources regarding questions about their performance and/or expected conduct standards.
- Sign corrective action documents to acknowledge receipt of the corrective action. Failure to sign does not invalidate the corrective action. Make use of the “Issue Resolution Process” located in this section of the handbook.

Manager Responsibilities

- Be proactive when managing performance employee conduct issues. Communicate performance and conduct expectations to employees and provide ongoing counseling and feedback.
- Initiate the corrective action process as performance issues occur. Consult with Human Resources for assistance prior to initiating the process.
- Lead and be consistent with all employees throughout the corrective action process.
- Discuss corrective actions in private and give employees the opportunity to respond.
- Review written corrective actions, probations, and terminations with next-level management and Human Resources prior to meeting with the employee.
- Inform employees of the issues resolution process if they wish to have the corrective action decision reviewed.
- Ask employees to sign all written corrective actions to acknowledge receipt. Give one signed copy to the employee and place the original in the employee’s HR file.
- .

Human Resources Responsibilities

- Consult with managers and employees as necessary throughout the corrective action process.
- Review written corrective actions, probations, and termination, and make recommendations, as appropriate.
- Work with managers to advise employees of the availability of the Business Health Services (BHS) program under appropriate circumstances.

Issue Resolution Process

Policy

Laureate takes great pride in its reputation for maintaining open and direct lines of communication between employees at all levels of the organization. We respect the intelligence of our employees and their ability to speak for themselves. It benefits everyone when employees feel free to bring questions, suggestions and concerns directly to their managers. For these reasons, we believe that outside representatives are not necessary in this relationship. If issues persist for an employee, the issue resolution process provides a system for review by higher levels of management and Human Resources.

When an employee is faced with an issue, he or she should see his/her manager first. If the issue remains unresolved, the employee can use the “Issue Resolution Process.” Contact Human Resources immediately to deal with issues of discrimination or harassment.

Steps in the Process

Step 1 – Meet with at least two levels of management

An employee must, in good faith, make every attempt to resolve the issue with his or her immediate manager and, if that is not successful, then with his or her next level manager.

Step 2 – Put it in writing

If the immediate manager or the next-level manager cannot resolve the issue, put the issue in writing. It is important to describe the issue, the desired result, and your proposed solution to the issue. This step should preferably occur within 20 business days of the occurrence of the problem.

Step 3 – Meet with your Human Resources representative

After an employee fully describes the issue in writing, Human Resources will help the employee and his or her manager consider how policies, procedures and practices relate to the issue. Often, Laureate’s policies will dictate a resolution to the issue.

Step 4 – Review by the Executive HR Leader, Vice President, Human Resources or other designated

representative If the issue remains unresolved through Step 3, the Senior Vice President, Human Resources or other designated representative of the Chief Executive Officer will review all previous documentation and render a final decision to the employee in writing, within 20 business days. (The employee will be notified if the issue requires more time.)

Purpose

- To provide a prompt and efficient response to employee issues.
- To encourage communication between employees and their managers.

Employee Responsibilities

- Discuss and attempt to resolve all issues with their immediate manager first. Put all issues in writing.
- Contact Human Resources if issues are not resolved through direct communication with their managers.
- Follow each step in the “Issue Resolution Process” until satisfied, or until the process ends at Step 4.

Manager Responsibilities

- Meet with employees, listen to their issues, and make every attempt to resolve the situation.
- Inform employees of their ability to use the “Issue Resolution Process” and the associated steps.
- Consult with Human Resources when an employee decides to begin the “Issue Resolution Process.”
- Do not retaliate against an employee who chooses to use the “Issue Resolution Process.”

Human Resources Responsibilities

- Be available to consult with employees and managers regarding the “Issue Resolution Process.”
- Help employees and managers consider how policies, procedures and practices relate to the issue.
- Assist with any necessary investigations relating to the “Issue Resolution Process.”
- Inform employees of progress on their issue as they move through the various steps.

Outside Employment

Policy

Outside employment is permitted only with written management approval preferably two weeks prior to obtaining the outside employment.

Outside employment must not: interfere with job performance; affect Laureate's and its subsidiaries' public image; interfere with the assigned work schedule; be conducted on company property; or compete with Laureate's business.

Attention Entrepreneurs: Refer to the Ethics/Corporate Governance and the Conflicts of Interest policies in Section Two of this handbook before engaging in private business endeavors.

Purpose

- To ensure that outside employment does not interfere with Laureate's business.
- To avoid a situation that may result in a real or perceived conflict of interest.

Employee Responsibilities

- Notify their manager of current or potential outside employment and receive written management approval.
- Avoid all outside employment and/or private business endeavors that may be in conflict with Laureate's "Confidentiality and Non-Disclosure Agreement and Covenant Not to Compete."

Manager Responsibilities

- Inform employees of the outside employment policy.
- Review and approve any outside employment in writing and send to Human Resources for inclusion in the employment file.
- Contact Human Resources to answer questions about outside employment.

Human Resources Responsibilities

- Be available to help managers determine if an employee's outside employment is in compliance with this policy.

Employee Files

Policy

Active employees may review the information in their employee file by scheduling an appointment with Human Resources. Times for file review may be limited, and an authorized manager must be present when files are reviewed.

Purpose

- To give employees the opportunity to review the information in their employee file.
- To ensure that employee files remain secure and intact.

Employee Responsibilities

- Contact Human Resources to schedule an appointment to review their employee file.
- Inform Human Resources or their manager of any changes or updates to their file. Employees may make a written statement regarding the information in their file. Any statements must be forwarded to Human Resources through their manager.
- Do not remove, damage, or alter the information in their employee file. Such conduct will result in corrective action, up to and including termination. Employees may make notes about (or request copies of) the contents of their file. All requests for copies must be made in writing and include an original signature.

Manager Responsibilities

- Ensure that the appropriate employee information is forwarded to Human Resources for inclusion in the employee files.
- Inform employees of the procedure for reviewing their employee files.
- Refer all requests for information on current or former employees to Human Resources.

Human Resources Responsibilities

- Inform managers about federal, state and local laws pertaining to employee files.
- Maintain the proper information in employee files.
- Schedule appointments with employees and coordinate the file review.

Job Posting

Policy

Laureate is committed to posting job opportunities as they become available. In certain circumstances, positions may not be posted. Internal and external recruitment may occur simultaneously or separately.

If an employee meets the following criteria, he or she may elect to apply for an open job posting:

- Satisfies the minimum education and experience requirements listed on the posting.
- Has been employed in his or her current position for at least six months.
- Is meeting current performance expectations, with no active corrective action.
- Has received written approval from their direct supervisor prior to applying.

Purpose

- To inform current employees of promotional and transfer opportunities that may help them advance their careers.
- To promote current employees, where practical, before hiring from outside the company.

Employee Responsibilities

- Check to see if they are eligible to apply for a specific position. If eligible, employees should submit, to Human Resources, a complete internal staffing application for each position of interest.
- Obtain written approval from direct supervisor prior to applying for another position within the company.

Manager Responsibilities

- Post open positions through Human Resources.
- Expose their employees to internal opportunities that may be beneficial to the employee and the company.
- Do not penalize an employee for expressing interest in career growth.
- Check with an employee's current manager to obtain a reference and a mutually agreeable start date, if they are hiring an internal candidate.
- Transfer employees within four weeks of the job offer. Unusual business needs, however, may dictate other time frames.

Human Resources Responsibilities

- Post job openings via the Laureate intranet.
- Collect and screen all internal applications and review them with the hiring manager.
- Consult with managers throughout the posting and selection process.
- Be available to answer any questions employees may have about the posting process.

Dress Policy

Policy

Laureate strives to provide a work environment that is both professional and comfortable for our employees. Laureate policy permits casual business wear. Employees are expected to present themselves professionally at all time and should be neat and clean in appearance.

Purpose

- To project a professional appearance to our clients/students.
- To promote safety in the workplace.
- To avoid offending our clients/students and fellow employees.

The following items are never appropriate attire for work:

- Shorts
- Short skirts
- Halter tops
- Tube tops
- Inappropriate logos on clothing
- Spandex
- Flip-flops/thong sandals
- Blue jeans
- Sweat suits
- T-shirts
- Shirt tails hanging out

If employees have any questions concerning the Laureate dress code, they should speak with their immediate supervisor or Human Resources.

Employee Responsibilities

- Use good judgment when selecting casual business attire. (Employees who are dressed inappropriately may be asked to return home to select suitable attire.)
- Be aware of their professional appearance at all times. When meeting with clients/students and/or external parties, employees should dress in accordance with the expectations of those individuals.

Manager Responsibilities

- Set an example of professional appearance.
- Inform employees immediately if they are dressed inappropriately and, if necessary, send them home.
- Utilize the corrective action process, if necessary.

Human Resources Responsibilities

- Ensure that this policy is applied consistently.

Inclement Weather

Policy

All Laureate locations will be open for business unless employees are notified otherwise. Some employees must report to work even if Laureate is officially closed. Please call the Weather Line at 877-628-4507 to determine if your location is open during adverse weather conditions.

When the office is officially closed on a scheduled workday, regular full-time employees will be paid for the entire day. Temporary employees and independent contractors will not be paid.

Purpose

- To allow Laureate to conduct essential functions even during inclement weather.
- To promote the safety of our employees and clients.
- To establish a system for announcing closure due to inclement weather.

Employee Responsibilities

- Understand and use the inclement weather notification process.
- Report to work if Laureate is open and weather conditions permit.
- Call their manager if they independently decide not to come to work and indicate if they are using a vacation day, floating holiday or taking an unpaid day.
- Remember that weather conditions often improve as the day progresses and that coming in late may be an option.

Manager Responsibilities

- Inform employees of the inclement weather notification process.
- Ensure that employees who take days off on their own volition are charged with a vacation day, floating holiday or unpaid day.
- Inform employees if the decision to close is made during a workday. Those who report to work should be paid for the entire day.

Human Resources Responsibilities

- Ensure that this policy is applied consistently.

Voluntary Termination

Policy

Employees may terminate their employment with Laureate at any time. Laureate does request that employees who plan to resign notify their manager in writing at least two weeks prior to leaving. Laureate will determine whether the employee should continue working once a resignation notice has been received.

Pursuant to the Consolidated Omnibus Budget Reconciliation Act ("COBRA"), Laureate, through its COBRA Administrator, will provide the EMPLOYEE with written notice of the right to elect to continue healthcare coverage.

More About Pay When Leaving Laureate

- Employees who resign will be paid through the last day worked, including any overtime worked.
- Employees will be paid for unused vacation leave according to the terms of the vacation policy.
- An employee is considered to have terminated employment as of the **last day worked** for pay purposes. Health benefits and the EAP program end on the last day of the month in which the employee has terminated employment. All other benefits end on the last day of employment.
- If employment ends while an employee is collecting Short-Term or Long-Term Disability benefits, the employee is considered to have terminated employment as of the date of separation from the company. Also, this separation does not affect the ability to receive continued disability benefits provided policy guidelines within the plan continue to be followed
- Deductions from final paychecks may occur for Laureate property that is not returned on or before termination, in accordance with the employee's signed authorization and applicable law.
- Final paychecks are paper checks and will be mailed to the employee's home address unless otherwise noted or as applicable with state law.

Purpose

- To ensure that employees are paid correctly upon termination of employment.
- To support our policy of "employment at will."

Employee Responsibilities

- Provide at least two weeks written notice of their intention to resign.
- Provide a letter of resignation to their manager (last day of work identified).
- Contact their manager or Human Resources for an exit interview prior to the last day of work.
- Return all company property to their manager on or before their last day of employment.
- Maintain satisfactory job performance up to their last day with Laureate.
- Understand that vacation leave generally cannot be used for the notice period.

Manager Responsibilities

- Manager should notify Human Resources and submit appropriate paperwork immediately upon notification of resignation.
- Discuss the resignation with the employee and ask the employee to participate in an exit interview.
- Complete all termination paperwork prior to the employee's last day of work.
- Collect all company property on or before the last day of employment.

Human Resources Responsibilities

- Conduct exit interview.
- Provide employees with benefits information and exit instructions, if applicable.
- Inform Benefits to mail employees' information about the continuation of benefits, including COBRA.
- Send Separation Checklist to Manager, if applicable.

SECTION FOUR

Information Technology (IT)

Policies

CORPORATE COMPUTING

INTERNET USE

EMAIL AND VOICE MAIL

CORPORATE TELEPHONES AND MOBILE ASSETS

Corporate Computing

Policy

Laureate makes computing and network resources available to its employees for business purposes only. These corporate resources are critical components of Laureate's communication system and are intended to be used solely by Laureate employees and used in a responsible manner. Employees who violate this policy are subject to corrective action, up to and including termination. Generally, employees should not share their User IDs or passwords with another person, unless there are business reasons to do so. Employees are responsible for their accounts and should log off when they are not at Laureate. Laureate reserves the right to monitor all Internet and computer access, and to search and consent to searches by third parties of all computer hardware and software.

Purpose

- To allow for effective, confidential and accurate communication with inside and outside customers/students and faculty.
- To protect Laureate's property, resources and competitive edge.
- To foster an environment free from discrimination or harassment.

Employee Responsibilities

- Choose a password that is not easily guessed by others and do not share the password with others.
- Notify your Help Desk if someone has made unauthorized use of your account.
- Do not intentionally seek information about, browse, obtain copies of, or modify files, passwords, or computer media that does not belong to them.
- Do not display or transmit, forward or download images, sounds or messages that could make others uncomfortable and/or which violate Laureate's non-discrimination or non-harassment policies.
- Use all corporate resources for Laureate business only. Playing games, sending non business related e-mails including chain letters and printing personal copies are prohibited.
- Use third-party software only with the express written permission of the owner of the proper license and the approval of Information Technology.
- Scan all software for viruses prior to use. Willful introduction of viruses or other disruptive or destructive programs is grounds for dismissal.
- Use only software that is approved by Laureate.

Manager Responsibilities

- Inform employees of their systems privileges and instruct them how to properly use these privileges.
- Review and monitor all computing/network resources, as appropriate, and in conjunction with the IT department.
- Issue corrective action, up to and including termination, for violation of this policy.

Human Resources Responsibilities

- Ensure that this policy is applied consistently.

Internet Use

Policy

Laureate gives its employees Internet access and expects them to use the Internet responsibly. The use of the internet through Laureate's network is a privilege, not a right, and as such it must be done in a manner consistent with Laureate's values. Employees who violate this policy are subject to corrective action, up to and including termination. Laureate reserves the right to monitor all Internet access and remove an employee's access when appropriate.

Purpose

- To allow for effective, confidential and accurate communication with inside and outside customers/students and faculty.
- To allow employees to acquire information from the Internet in order to assist with their assigned duties.
- To help foster an environment free from discrimination or harassment.

Employee Responsibilities

- Be mindful of copyright laws, and do not disseminate or print copyrighted materials.
- Protect Laureate's competitive edge by *not* sending, receiving, printing, or otherwise disseminating proprietary data, trade secrets or other confidential information without prior authorization.
- Do not send or solicit sexually oriented messages or material that may be offensive or discriminatory to others.
- Do not engage in any activity in violation of local, state or federal law.
- Do not introduce worms, trojans, viruses or any other software that maliciously interferes with computing operations.
- Do not use Laureate Internet access for personal gain or personal business transactions.
- Do not violate student privacy by transmitting student information without written permission from the student.
- Refrain from excessive use of the Internet. Access the Internet for personal use only when it does not interfere with workplace productivity, and never use it for personal gain or entertainment purposes.
- Laureate implements a filter that is intended to block web sites that are offensive or threatening in nature, such as viruses and other security threats and reserves the right to deny access to specific websites as appropriate.
- Access the Internet only when authorized to do so.

Manager Responsibilities

- Inform employees of their Internet privileges and instruct employees in how to properly use them.
- Review and monitor all Internet access, as appropriate, in conjunction with the IT department.
- Issue corrective action, up to and including termination, for violation of this policy.

Human Resources Responsibilities

- Ensure that this policy is applied consistently.

Email and Voice Mail

Policy

Laureate makes email and voice mail available to its employees. These corporate assets are critical components of Laureate's communication system, and employees are expected to use them responsibly. Employees who violate this policy are subject to corrective action, up to and including termination. Laureate reserves the right to monitor, search and consent to searches by third parties of all email and voice mail messages. As part of its email system, Laureate implements a filter that is intended to block electronic messages that are offensive or threatening in nature, such as viruses and other security threats. Email, voice mail, Internet access (and other computer access) are not private.

Laureate will determine limits in the storage capacity of voice mail and email systems and employees are responsible for maintaining their own inboxes within the established limits. Failure to comply may result in the loss of data as the purging processes are applied after prior notice, to inboxes exceeding these limits.

Purpose

- To allow for effective, confidential and accurate communication with inside and outside customers/students and faculty.
- To foster an environment free from discrimination or harassment.

Employee Responsibilities

- Understand that email and voice mail are not private and are the property of Laureate.
- Do not allow personal use of email or voice mail to interfere with business activity.
- Do not forward or redirect company email to personal addresses or addresses outside the company except for business purposes.
- Maintain the security of your accounts and passwords. Change your passwords regularly, and log off when your terminal is unattended.
- Do not open suspect attachments, redirect suspect messages or expose the companies' systems as a result due to a message that may have bypassed the security mechanism. Review messages that have been stopped by the email filters to check for legitimate messages that may have been blocked in error.
- Encrypt email and files sent over the Internet only with software approved by Laureate.
- Do not display or transmit images, sounds or messages that are sexually oriented or discriminatory, or that could make others uncomfortable.
- Use corporate resources for business only. Sending chain letters, sending confidential messages to non-Laureate employees and soliciting are prohibited.
- Do not exceed the established storage capacity limits for voice mail and email. Purge and archive your email and voicemail inboxes regularly.

Manager Responsibilities

- Inform employees of their email and voice mail privileges and instruct employees how to use them properly.
- Review and monitor all email and voice mail, as appropriate, and in conjunction with the IT department.
- Issue corrective action, up to and including termination, for violation of this policy.

Human Resources Responsibilities

- Ensure that this policy is applied consistently.

Corporate Telephones and Mobile Assets

Policy

Laureate makes corporate telephone service and mobile assets available to some employees. These corporate assets are critical components of Laureate's communication system, and employees are expected to use them responsibly. Telephones and mobile assets are subject to Laureate's Information Technology policies just as any other company-provided equipment. Laureate reserves the right to monitor all incoming and outgoing telephone calls to the extent permitted by federal, state or local law. Accepting collect calls is prohibited except in an emergency situation.

Laptops are assigned to employees whose job requires them to carry computing devices while traveling. Laureate provides a locking device with each laptop so it can be secured when stationed at your desk.

In accordance with the payroll authorization signed by all new employees, Laureate reserves the right to deduct from an employee's paycheck (consistent with local and state law) the cost of personal telephone calls charged by the employee to the company. Employees who violate this policy are subject to corrective action, up to and including termination.

Laureate will not pay for more than one device. For example, the Company will not provide an employee with both a BlackBerry® and cell phone.

Purpose

- To allow for effective, confidential and accurate communication with inside and outside business partners and students.
- To control corporate telephone costs.
- To protect corporate mobile assets.

Employee Responsibilities

- Use the provided phone, cell phone, BlackBerry®, calling cards, conference call and other related resources within the established company expense guideline.
- Do not keep, under any circumstances, sensitive data including, but not limited to, financial data, student information or other highly sensitive data in mobile computing devices such as, laptops, BlackBerry®, PDA computers, etc. or download such data onto a flash drive or portable hard drive that is removed from the office.
- Secure your laptop at all times by locking it when at your desk. Do not leave an unsecured laptop in your office. Request a locking device if you do not have one.
- Do not accept collect calls, except in an emergency situation.
- Follow appropriate procedures and limit the number of personal telephone calls during business hours.
- Do not charge personal long-distance calls to Laureate.

Manager Responsibilities

- Ensure that all phone resources are utilized in the most cost effective manner.
- Inform employees of their telephone privileges and instruct employees how to use them properly.
- Review and monitor telephone calls (in conjunction with the IT department), to the extent permitted by federal, state or local law.
- Issue corrective action, up to and including termination, for violation of this policy.

Human Resources Responsibilities

- Ensure that this policy is applied consistently.

SECTION FIVE

Compensation

COMPENSATION

PROMOTIONS AND TRANSFERS

OVERTIME

WAGE PAYMENT ISSUE RESOLUTION

PAYROLL

Compensation

Policy

Laureate strives to offer competitive compensation that recognizes performance. Total compensation is a combination of numerous items: including base salary; health benefits; reward and recognition programs; 401(k); life insurance; paid time off; disability plans; and incentive compensation. Laureate has a “Common Review Date” to review performance and compensation, although a review does not guarantee an increase in salary.

Guidelines

Employees should receive a performance review in advance of their salary review date. Managers review their entire department’s compensation after all performance reviews are completed. Based on those reviews and other factors (the employee’s position level, general market condition, internal equity, the company’s overall performance and merit increase pool, etc.), the manager may recommend a merit increase. All salary increases must be reviewed and approved by two levels up in the organization and Human Resources (i.e., a manager’s manager must review all salary action recommendations).

A performance review does not guarantee an increase in salary. If an employee is involved in any type of written corrective action, he or she may not be eligible for an increase, and a manager may postpone this decision for up to six months.

A formal leave of absence, whether paid or unpaid, of one month or longer, will impact eligibility and timing for a salary increase. Increases should be prorated to reflect the amount of time the employee was away from work.

Purpose

- To reward and recognize job performance.
- To attract, motivate and retain quality employees.

Employee Responsibilities

- Consult with their manager and/or Human Resources with questions about compensation.
- Use discretion when discussing compensation. Discussions regarding base pay should occur with an employee’s manager or Human Resources.
- Give input during the performance evaluation process.

Manager Responsibilities

- Explain Laureate’s compensation principles to their employees.
- Inform employees of how their performance corresponds to their compensation.
- Postpone salary increases during written corrective action.
- Work with Human Resources to review the need for incentive compensation plans. If it makes business sense, managers and Human Resources will work together to develop, communicate and implement any incentive programs.
- Ensure that each employee has appropriate access to his or her job description.
- Forward all appropriate compensation paperwork to Human Resources.

Human Resources Responsibilities

- Be available to help managers provide each employee with an accurate and appropriately evaluated job description.
- Evaluate positions and assign appropriate position levels.
- Ensure the consistent application and utilization of compensation policies, including the management of the “Common Review Dates.”
- Work with managers to develop and implement relevant incentive compensation plans.

Promotions and Transfers

Policy

Laureate employees may change location or job status for various reasons if the change is approved by their manager. Reasons for promotions and transfers may include: career advancement, business necessity, job re-evaluation, performance or employee-requested transfer. Promotions and transfers may or may not result in changes in the employee's compensation.

Purpose

- To provide employees with career advancement opportunities when practical.
- To allow Laureate the flexibility to promote, transfer and reassign employees as business needs dictate.

Employee Responsibilities

- Follow the appropriate procedure as outlined in the job posting policy if they are interested in promotions or transfers.
- Consult with their manager or Human Resources with questions about promotions and/or transfers and any associated compensation changes. Employees may consult with Human Resources, confidentially, about a position, but prior to an interview **must** seek approval from their current manager.
- Seek training and opportunities to earn qualifications for promotion, should they wish to advance.
- If employee is transferring across sites, work with Human Resources for relocation and processing the appropriate paperwork including tax documents, address changes, etc.
- Be in their position (generally) six months or longer prior to requesting a promotion or transfer. Lateral moves are not necessarily eligible for salary increases.

Manager Responsibilities

- Inform employees in person (and in writing) of the circumstances surrounding a promotion and/or transfer, and the effect (if any) on their compensation.
- Consult with Human Resources to determine promotion eligibility if an employee's job responsibilities change significantly, or if an employee moves into a position at a higher level.
- Discuss the employee transfer with the current manager prior to an offer or transfer.
- Provide Human Resources with appropriate paperwork related to promotions and/or transfers and any associated compensation changes.
- If this is a new position, managers need to provide a new job description to Human Resources to review.
- Allow a two-to-six-week period in an internal job-transfer situation. Six weeks is the maximum time period that a manager may hold on to a transferring employee.

Human Resources Responsibilities

- Be available to consult with managers and employees regarding promotions and/or transfers and any associated compensation changes.
- Ensure consistency in the promotion/transfer process.

Overtime

Policy

Unless otherwise required by law, non-exempt employees are paid one and one-half times their regular hourly rate for hours worked in excess of 40 hours per work week. Employees are compensated only for hours worked. Laureate holidays, vacations, sick days, bereavement leave, jury duty, etc. are not counted toward time worked when calculating overtime. Exempt employees are not eligible for overtime pay.

Some states have different laws governing overtime. Where this policy differs from state requirements, state law prevails.

Purpose

- To comply with wage and hour laws.
- To compensate non-exempt employees for working more than 40 hours in a workweek.

Employee Responsibilities

- Request manager approval prior to working overtime (if eligible).
- Document overtime correctly, and review and sign time sheets. Time sheets are legal documents. Employees are held accountable for inaccurate or falsified time sheets.

Manager Responsibilities

- Tell employees if they are eligible for overtime.
- Give employees as much notice as possible when overtime is required.
- Approve all overtime prior to it being worked.
- Ensure that regular and overtime hours are recorded accurately for each employee .
- Submit time/attendance records accurately and on time.
- Monitor pay practices to avoid unpaid overtime by non-exempt employees.

Human Resource Responsibilities

- Classify employees as exempt or non-exempt based on legal requirements.
- Inform managers of employee classifications and how they affect eligibility for overtime pay.
- Understand local state laws governing overtime requirements.

Wage Payment Issue Resolution

Laureate is committed to following the requirements of the Fair Labor Standards Act and state law as they relate to the payment of wages to exempt and non-exempt employees. Employees are responsible for accurately recording their hours worked and should treat time records with the same level of care and integrity as all other company records.

Laureate makes every effort to properly classify employees as either “exempt” or “non-exempt” under the Fair Labor Standards Act and state law. If you are unsure of your classification, your supervisor can tell you. If you feel that you have been improperly classified, you should make a written inquiry to Human Resources stating the reasons why you believe you have been improperly classified.

Laureate prohibits improper deductions from the pay of all employees. If you believe that Laureate has improperly deducted wages from your pay, you should make a written inquiry Human Resources, stating the date(s) of the improper deduction(s), the amount that was improperly deducted, the reason(s) for the deduction, and a statement of why the deduction was improper.

Similarly, non-exempt employees who believe that they have not been properly paid for all hours worked should submit a written inquiry to Human Resources, detailing the amounts they believe were not properly paid. Laureate requires that all overtime be approved in advance by the employee’s supervisor; however, all hours worked must be paid.

Upon receipt of an inquiry as described above, Laureate will conduct a prompt investigation. If Laureate determines that improper deductions were made from your pay, or that you were not properly paid for all hours worked, Laureate will take appropriate remedial action and will reimburse you for all amounts improperly deducted or unpaid.

No retaliation will be tolerated against any employee for making a good faith inquiry under this policy or for assisting or participating in any investigation. Any attempt at retaliation will be subject to the appropriate disciplinary action, up to and including discharge.

Payroll

Policy

Employees are paid semi-monthly on the 15th and the final business day of each month. Advances in pay are not permitted.

Purpose

- To pay Laureate employees accurately and in a timely fashion.

Employee Responsibilities

- Review, submit and keep a copy of all time sheets (in eTime). Time sheets are legal documents. Falsification may result in corrective action, up to and including termination.
- Inform their manager immediately if a paycheck contains an error.
- Complete the appropriate forms for a change in address or tax withholding, so appropriate changes can be reflected in Human Resources.
- Reimburse Laureate for any overpayment in accordance with applicable state law

Manager Responsibilities

- Provide Payroll with the necessary information for Human Resources to assign an employment classification to all employees.
- Approve all information for their employees' on the time sheets and send time sheets to Human Resources on or before the posted deadline.
- Contact Human Resources if a problem occurs with an employee's pay.
- .Complete and submit termination paperwork on a timely basis.

Human Resources Responsibilities

- Interface with Payroll for payroll processing.
- Investigate and resolve all payroll issues.
- Keep electronic records of all time sheets in a safe location for a period of 12 months and ensure that Payroll maintains these records to the extent legally required.

SECTION SIX

Benefits

VACATION

HOLIDAYS

SICK LEAVE

FAMILY AND MEDICAL LEAVE

SHORT-TERM AND LONG-TERM DISABILITY PAY

BEREAVEMENT LEAVE

JURY DUTY

MILITARY LEAVE

UNPAID PERSONAL LEAVE OF ABSENCE

WORKERS' COMPENSATION

EMPLOYEE ASSISTANCE PROGRAM

TUITION REIMBURSEMENT

EMPLOYEE TUITION REDUCTION PROGRAM

RELOCATION

Vacation

Policy

Paid vacation leave is provided each calendar year to regular full-time employees based on their length of service with Laureate and, in certain cases, their position level. Employees accrue vacation time for each full month of service and are eligible to use vacation time after completing 90 days of employment. Unused, earned vacation leave may not be carried over from year to year, except as otherwise required by state law. All vacation must be requested in advance and must be approved by the employee's manager.

For Maryland Employees Only

In compliance with Maryland's Flexible Leave Act, employees in Maryland may use either accrued sick or vacation leave, once that leave is available, to care for an immediate family member with an illness or injury. Please see provisions of this policy in the Sick Leave section.

More About Vacation Leave

- Vacation leave must be used within the calendar year, except as otherwise required by state law. It is the employee's responsibility to manage and track his or her vacation leave each calendar year.
- Vacation leave does not count as hours worked when determining overtime.
- Paid vacation days are equal to the number of hours in the employee's regular workday.
- Vacation time is paid at the eligible employee's base rate of pay at the time of vacation. It does not include overtime or special forms of compensation such as incentives, bonuses, commissions or shift differentials.
- With manager approval, employees may borrow up to 3 days (24 hours) of vacation time that will be earned later in the *same* calendar year. Employees may not borrow vacation time from future years.
- Vacation leave is not earned during any leave of absence period.
- Employees who leave Laureate will be paid for earned, unused vacation. This provision may be modified according to state or local law.
- Employees leaving Laureate with a negative balance will have the value of that vacation time deducted from their final paychecks, in accordance with applicable law.
- Accrued vacation may not be taken until after completing 90 days of employment unless otherwise required by state law or prior approval from your manager.

Regular full-time employees who are eligible at time of hire to earn two weeks of vacation annually will accrue vacation pursuant to the following schedule:

Length of service	Monthly Accrual	Days per year earned
0 – 4 years	6.67 hours	10 days (80 hours)
5 – 14 years	10.0 hours	15 days (120 hours)
15 – 24 years	13.34 hours	20 days (160 hours)
25 years and over	16.67 hours	25 days (200 hours)

Regular full-time employees who are eligible at time of hire to earn three weeks of vacation annually will accrue vacation pursuant to the following schedule:

Length of service	Monthly Accrual	Days per year earned
0 – 9 years	10.0 hours	15 days (120 hours)
10 – 24 years	13.34 hours	20 days (160 hours)
25 years and over	16.67 hours	25 days (200 hours)

Purpose

- To provide eligible Laureate employees with time off each year to relax and concentrate on personal interests, while balancing the company's needs.
- To attract and retain quality employees.

Employee Responsibilities

- Obtain approval (by submitting a Request for Leave form to your supervisor) and use all vacation leave in the calendar year in which it is earned.
- Complete the first 90 days of employment before using vacation leave.
- Request vacation leave in advance, and obtain written management approval prior to taking any vacation leave.

Manager Responsibilities

- Ask eligible employees to submit vacation requests in advance.
- Approve vacation requests after reviewing business commitments. Managers may deny vacation leave due to certain business requirements.
- Encourage employees to schedule vacations during the calendar year, and encourage employees to take the proper amount of vacation time.
- Record and report vacation time for all employees accurately.
- Forward approved Request for Leave Form to Payroll for processing.

Human Resources Responsibilities

- Ensure that this policy is applied consistently.

Holidays

Policy

Holidays

Laureate generally provides 8 paid scheduled holidays each year to regular full-time employees. Eligible full-time non-exempt employees who work on a designated holiday will be paid for the holiday plus paid straight time for the hours worked on the holiday. Part-time hourly employees are not eligible.

Floating Holidays

In addition to the eight scheduled holidays observed, employees will be granted up to two floating holidays. Full-time employees will be granted up to two 8-hour floating holidays. Part-time employees working up to 30 hours per week will be granted up to two 5-hour floating holidays. The floating holidays must be taken during the calendar year in which they are earned (January - December), or they are forfeited.

New Hires: Any new employee hired between January 1 and May 31 will be eligible for two floating holidays. Any new employee hired between June 1 – August 31 will be eligible for one floating holiday. Any new employee hired after September 1 will not be eligible to receive any floating holidays for the year of hire.

Employees must receive approval in advance from their manager to take a floating holiday, and they must use their floating holidays within the calendar year.

Holidays do not count as hours worked when determining overtime.

The company follows all applicable state laws when determining the holiday policy.

Employees must submit a Request for Leave form for floating holidays to their immediate manager for approval. Following the manager's approval, the Time Off Form is forwarded to Payroll for processing.

Purpose

- To allow employees to spend holidays free from their job responsibilities whenever possible.

Employee Responsibilities

- Use floating holidays within the calendar year they are provided. Floating holidays must be requested in advance and approved by your manager.

Manager Responsibilities

- Ensure that eligible employees receive the correct amount of paid holiday time.
- Ensure that employees who are required to work on a holiday are paid correctly.

Human Resources Responsibilities

- Publish the corporate holiday schedule prior to the beginning of each calendar year.
- Ensure policy and procedures

Sick Leave

Policy

Regular full-time employees earn sick leave with each pay period for use when they or an immediate family member is ill. Employees accrue up to six days of paid sick leave per year; sick days may be prorated depending upon date of hire. Sick days are accrued at a rate of one half-day per month, to a maximum of 30 days. For example, an employee with a hire date of May 5 would accrue 32 hours (or four days) by the end of December.

- Sick leave is generally intended for absences caused by a non-occupational illness or injury to the employee or an immediate family member and not intended for the use of vacation
- Sick leave does not count as hours worked when determining overtime.
- For occupational injuries, see the Workers' Compensation policy in this section of the handbook.
- Laureate may request medical verification that an absence, no matter how long, was due to a bona fide illness.
- Refer to the Attendance and Punctuality policy in Section Three of this handbook for additional information

Accrual of sick leave stops when an employee accrues 30 days of leave, and will not begin again until/unless the employee's accrual falls below 30 days. Sick leave may not be borrowed from future accumulation. Sick leave is not paid out upon termination of employment, because it is intended to allow employees time off when necessary to care for themselves or an immediate family member and is not meant to be an additional benefit of employment.

For Maryland Employees Only

In compliance with Maryland's Flexible Leave Act, employees in Maryland may use either accrued sick or vacation leave to care for an immediate family member with an illness or injury. For purposes of this law, "immediate family" means a child (under the age of 18, or over the age of 18 if incapable of self-care), spouse or parent. Laureate will not retaliate against employees who use leave pursuant to this policy.

Provisions:

An employee may only use accrued leave under this policy.

An employee may elect the type (accrued sick or vacation) and amount of paid leave and must follow Laureate's policies for the use of the type of leave elected.

An employee may use accrued leave once earned and available for use under Laureate's policies.

If an employee exhausts all leave (sick and vacation) and still needs to take time off to care for a sick "immediate" family member, then the time off does not fall under the Maryland Flexible Leave Act. This time off may be viewed as an occurrence on the employee's attendance record unless covered by Family Medical Leave.

Maryland Flexible Leave may run concurrently with FMLA. See Family Medical Leave Policy.

Purpose

To allow eligible employees time to rest and recover when they or an immediate family member become ill or injured.

Employee Responsibilities

- Use their sick leave responsibly. Sick leave is generally intended for use only in cases of occasional and infrequent absences of fewer than three days, caused by illness or injury, and should not be abused. Misuse of sick leave is grounds for dismissal.
- Call their direct manager no later than 30 minutes after the start of their workday if they are unable to report to work. Messages left on voice mail are not sufficient. Employees must call in on each and every day of absence and should advise their supervisor as to the expected length of their absence. Employees who are calling out to care for an immediate family member should notify their direct supervisor whether they would like the time counted against their accrued vacation or sick leave.
- Provide their manager with a written statement signed by the attending physician verifying that they are able to return to work as well as the reason for the absence (if they are absent for three or more consecutive days). Non-compliance with this policy may result in corrective action, up to and including termination. Refer to the Family and Medical Leave Act policy that may apply in some cases.
- Advise Human Resources if you anticipate being absent for more than five business days.

Manager Responsibilities

- Review employee attendance records carefully to ensure that sick time is tracked and recorded properly.
- Obtain confirmation from employees who are using sick leave to care for an immediate family member as to how they want their leave to be counted (vacation, sick, etc.).
- Consult Human Resources if they suspect that sick leave is being abused. Managers should not ask employees for specific information about the nature of any illness.
- Forward any medically-related documentation in confidence to Human Resources.

Human Resources Responsibilities

- Ensure that this guideline is applied consistently.
- Help managers apply corrective counseling in cases of inappropriate or excessive use of sick leave.
- Educate employees and managers regarding applicable laws.
- Comply with state laws, including the Maryland Flexible Leave Act.

Family and Medical Leave, Including Military Family Leave

Policy

Laureate follows the federal Family and Medical Leave Act (“FMLA”). Generally, eligible employees are entitled to up to 12 weeks of unpaid leave per rolling 12-month period for the birth, adoption or foster care of a child; to care for a child, spouse, or parent with a serious health condition; for the employee’s own serious health condition; and for a “qualifying exigency” associated with their spouse, child, or parent who is a member of the Armed Forces on active duty in a foreign country or called to active duty in a foreign country.. Eligible employees who are the child, spouse, parent, or next of kin (defined as the nearest blood relative) of a covered servicemember may also take up to 26 weeks of unpaid leave in one single 12-month period to care for this servicemember. A “covered servicemember” is: a member of the Armed Forces who has a serious injury or illness incurred in the line of duty on active duty or aggravated by service in the line of duty on active duty, which may render the servicemember unfit to perform the duties of his/her office, grade, rank or rating, and who is undergoing medical treatment, recuperation or therapy, in outpatient status, or otherwise on the temporary disabled list; or a veteran who is undergoing medical treatment, recuperation or therapy for a serious injury or illness incurred in the line of duty on active duty or aggravated by service in the line of duty on active duty, and who was a member of the Armed Forces during the 5-year period preceding the date on which such treatment, recuperation or therapy began.

- Certain eligibility rules and requirements may differ based upon the state laws where the employee is employed. Employees will be provided with additional information if this applies to them. Please speak with your supervisor or Human Resources if you have any questions.
- If two employees of Laureate are married to each other, they may take only a combined 12 weeks of leave per 12 month period for the birth/adoption/foster care of a child. Similarly, two married employees may not use more than a total of 26 weeks combined to care for an injured servicemember.
- With the exception of FMLA leave taken for the birth/adoption/foster care of a child, which must be taken continuously, FMLA leave may be taken intermittently or on a reduced schedule basis when medically necessary and supported by proper medical certification. FMLA leave to deal with a military service member’s “qualifying exigency” may also be taken on an intermittent basis.
- The total amount of FMLA leave taken for any of the reasons set forth above may not exceed 12 weeks in a rolling 12-month period, except that leave to care for an injured or ill servicemember, when combined with other FMLA-qualifying leave, may not exceed 26 weeks in a single 12-month period.

Purpose

FMLA can be used by eligible employees:

- For the birth of, or to care for a newborn child.
- For placement with the employee of a child for adoption or foster care.
- To care for the employee’s spouse, child, or parent who has a serious health condition.
- Because of a serious health condition that makes the employee unable to perform the functions of his or her job.
- For a “qualifying exigency” associated with a child, spouse, or parent’s active duty in a foreign country or call to active duty in a foreign country.

- To care for a child, spouse, parent or individual to whom the employee is the next of kin (closest blood relative) who has incurred an injury or illness or aggravated an injury or illness while on active duty in the Armed Forces, provided that such an injury or illness rendered the family member medically unfit to perform duties of the member's office, grade, rank, or rating.

Eligibility and Provisions

Employees who (1) work in facilities with more than 50 employees within a 75 miles radius (2) have been employed by the Company for at least 12 months, and (3) have worked at least 1,250 hours in the 12 months prior to requesting leave are eligible for FMLA leave.

FMLA leave is unpaid leave. However, all earned paid leave, such as vacation and sick time, must be taken during FMLA leave, (unless employee is receiving disability benefits from a company sponsored disability plan), with the balance of the 12 weeks, if any, taken as unpaid leave. Upon return from approved FMLA leave of up to 12 weeks, in general, eligible employees will be returned to the same position held prior to the leave, or one that is substantially equivalent in pay, benefits, and other terms and conditions. Health coverage will be maintained during the leave period, provided the employee continues to pay his or her portion of the premium in a timely manner.

It is Laureate's policy not to discharge, discriminate against, or otherwise retaliate against any employee exercising his or her rights under the federal Family and Medical Leave Act. If you have questions about this policy, please contact Human Resource

Employee Responsibilities

- Submit family and medical leave requests in writing to the Corporate Benefits Department and file an FMLA claim with FMLA Administrator at least 30 days in advance, when the leave is foreseeable, or as soon as practical thereafter. FMLA Forms are available from the Corporate Benefits Department and/or can be found on MyLaureate (the company intranet site).
- File an FMLA claim with the Corporate Benefits Department.
- Submit written medical certification when taking family and medical leave to care for a seriously ill spouse, son, daughter or parent; to care for an injured servicemember; or due to the employee's own serious health condition that makes the employee unable to perform one or more essential job functions. The company allows up to 15 business days to provide supporting documentation for the need for leave.
- Submit written certification of the need for "qualifying exigency" leave. The company allows up to 15 business days to provide supporting documentation for the need for leave.
- Re-certification may be required on a periodic basis. All FMLA re-certification paperwork should be forwarded directly to the FMLA Administrator. Employees with questions should ask their Human Resources Representative.
- Remit health insurance premiums as required, either through payroll deduction, or by personal check. If you are receiving compensation from Laureate or through the Disability Plan, deductions will continue and a personal check will not be required.
- Prior to returning to work, an employee who takes leave due to his or her own serious health condition is required to submit certification from a health-care provider that he or she is able to resume work. The "Return to Work" statement must be submitted to the employee's Manager with a copy to the Corporate Benefits Department. Any employee returning to work without the certification from the healthcare provider will be asked to leave the workplace until certification can be obtained.
- Return to work after an approved leave has expired. Employees who fail to return to work after their approved leave has expired may be terminated.

Manager Responsibilities

- Work with the Corporate Benefits Department to track an employee's paid and unpaid leave. Report paid and unpaid leave for non-exempt employees on the time sheet (eTime).
- Notify Human Resources immediately if an employee does not return to work after an approved leave.

Human Resource and Corporate Benefits Responsibilities

- Provide approval notification to the employee and the manager.
- Ensure that an employee benefits representative sends employees notification that their health insurance premiums are due.
- Maintain all confidential information.
- Ensure that an employee benefits representative notifies employees who fail to return to work of their rights under COBRA.

Short-Term and Long-Term Disability Benefits

Policy

Laureate has arranged for insurance coverage in the event that an eligible full-time regular employee suffers a short- or long-term disability. Laureate pays for this coverage and there is no cost for employees. For details of this coverage, please consult with the Benefits Department for information pertaining to the Summary Plan Descriptions.

Please note, certain states have laws governing both short-term and long-term disability benefits and state mandated disability benefits will take precedence over the company plans.

Purpose

To provide income replacement in the event that an eligible employee suffers a short- or long-term disability.

Short-Term Disability Benefits

Employees are eligible for short-term disability coverage (“STD”) on the first day of the month following 90 days of full-time employment. Should you become disabled and under a physician's care, you may use available sick, vacation or floating holiday time for the first 5 working days of the 7 day elimination period, to continue your salary. If you do not have any remaining sick, vacation or floating holiday time, these days will be taken without pay. Short Term Disability benefits begin on the 8th calendar day of disability. At that time, assuming your claim has been approved, you will receive 100% of your base pay for a maximum of 6 weeks. After that, benefits are payable at 60% up to \$1500 per week for the next 20 weeks. A claims administrator monitors the length of disability and determines when STD benefits should end. Short Term Disability benefits are taxed as ordinary income and insurance premiums will be deducted to continue benefits during the disability period. Short-term disability benefits runs concurrent with Family Medical Leave for eligible employees.

Long-Term Disability Benefits

Employees are eligible for long-term disability (“LTD”) coverage on the first day of the month following 90 days of full-time employment. LTD insurance provides 60 percent of basic monthly earnings, up to a maximum of \$6,250 per month. LTD benefits are non-taxable.

Employees may also elect to purchase additional coverage under the LTD Buy-Up Program. If elected, the benefit payable increases to replace 66 2/3% of your base monthly salary, up to \$7,500.

There is a 180-day waiting period from the date disability began to be eligible for LTD. Employees must be receiving Short-Term Disability Benefits during the first 180 days to be eligible for Long Term Disability Benefits. Like STD, LTD benefits are monitored by a claims administrator, who determines the length of disability and when LTD benefits should end. Employees may not collect LTD coverage and paid leave (sick, vacation, holiday, etc.) simultaneously.

Employee Responsibilities

- Eligible employees must submit a completed short-term disability packet, which includes a Time Off Request Form. Eligible employees must also initiate a Short Term Disability claim with the claims administrator of the company sponsored Disability Plan. Leave forms are available through the Corporate Benefits Department or in the Forms section on MyLaureate.com.
- Keep their manager, Human Resources, and the Corporate Benefits Department informed of their anticipated return-to-work date. Laureate requires medical certification that employees can return to work.

Manager Responsibilities

- Follow the proper procedures and submit the appropriate paperwork for reporting the absence.
- Receive approval from the Benefits Department and the employee's health-care provider before an employee returns to work.

Human Resources Responsibilities

- Be available to work with employees and managers to answer any questions regarding STD and LTD benefits.

Bereavement Leave

Policy

Regular full-time and part-time employees are provided with up to three days of paid bereavement leave for a death in their immediate family. For purposes of this policy, immediate family means spouse or domestic partner, child, parent/guardian, brother, sister, grandparent, grandchild or any person that is deemed a family member.

Purpose

- To allow regular employees the opportunity to spend time away from work when a death in the immediate family occurs.

Employee Responsibilities

- Notify their manager of the need to use bereavement leave as far in advance as possible.
- Provide proof of a death in the family (i.e., a death certificate copy), if required.

Manager Responsibilities

- Request proof of death after the employee returns to work.

Human Resources Responsibilities

- Ensure that this policy is applied consistently.
- Be available to help managers apply corrective counseling in cases of inappropriate use of bereavement leave.

Jury Duty

Policy

Laureate recognizes an employee's civic responsibility to serve on a jury if requested to do so. Regular full-time employees will be paid their full salary for up to five days, and regular part-time employees will be paid their hourly rate for up to three days. Leave will be allowed for the period of jury service. All employees may take unpaid leave as needed to perform jury duty.

Purpose

- To allow employees to fulfill their civic responsibilities by serving on a jury when summoned.

Employee Responsibilities

- Submit a copy of their jury duty summons to their manager upon receipt.
- Contact their manager daily to inform him or her when they need to be in court.
- Report to work on days when they are not on jury duty and on partial days when the court doesn't require their presence.
- Employees that are subpoenaed to appear in court will be allowed to take the day off to attend court, but this day is unpaid unless the employee utilizes vacation time or a floating holiday.

Manager Responsibilities

- Request written proof of jury duty.
- Ask employees to postpone jury duty, if possible, if there is a business necessity.
- Ensure that eligible employees are paid, consistent with this policy, when serving jury duty.

Human Resources Responsibilities

- Ensure that this policy is applied consistently.

Military Leave

Policy

Employees will be granted an unpaid military leave of absence of up to five (5) years for active service or training in the U.S. military forces, contingent on meeting eligibility requirements. Eligible employees continue to earn service credit as if they were at work, and are guaranteed a job to the extent required by law if they comply with reinstatement requirements. Employees must provide proof of military training obligations prior to going on leave.

Purpose

To allow eligible employees to fulfill military commitments by making unpaid leave available for service.

More About Military Leave and Benefits

- Laureate will continue to pay an employee's regular base salary for the first 90 days of the active military duty.
- Participation in benefit plans stops following 90 days of active military duty, during military leave and immediately resumes when the employee returns from leave.
- Employees may be eligible for COBRA.
- During military leave, employees receive service credit for participation in the 401(k) plan. If eligible for the 401(k) plan, the employee may be eligible to make catch-up contributions when the employee returns to work.
- Under current law, when employees return from a military leave of absence, they are entitled to any salary increases they would have received if they had been at work during the period of the military leave.
- Under current law, employees on a military leave of absence are guaranteed the same or a suitable job so long as they are not released from military service under unfavorable conditions, as defined in the statute and regulations. Employees must also apply for reinstatement to Human Resources within the required legal time frames.
- A suitable job is a position the employee qualifies for through skills, performance, education and training.
- See the Family and Medical Leave, Including Military Family Leave policy for information regarding leave to care for injured military family members and to assist if military family members are on active duty in a foreign country or called to active duty in a foreign country.

Employee Responsibilities

- Notify their manager (if possible) at least one month prior to beginning military leave for active service.
- Inform their manager of military training requirements as far in advance as possible.
- Provide documentation of their military training obligations to their managers prior to leaving.
- Contact an employee benefits specialist for specific benefits information before beginning military leaves of absence.
- Produce a copy of their military orders, as soon as reasonably possible, for active service.
- Provide copies of their military orders for active service to their manager upon return from military leave.

Manager Responsibilities

- Notify Human resources at least three weeks before an employee begins military leave. (Military leave is granted automatically, but employees will be required to provide appropriate documentation within a reasonable period of time.)
- Complete a request for leave form and forward to Human Resources.

Human Resources Responsibilities

- Be available to answer any questions regarding benefits while on military leave.
- Ensure that payroll is aware of any unpaid leave.
- Inform managers of any applicable laws regarding military leave.

Volunteer Policy

Policy

Laureate recognizes our responsibility as a good corporate citizen to help enrich our surrounding communities by supporting volunteerism. We encourage our employees to become involved in their communities, lending their voluntary support to programs that positively impact the quality of life within these communities.

Volunteer leave time is provided each calendar year to employees working 30 hours or more who have at least 6 months of service. Laureate allows employees to take up to eight (8) hours of time each calendar year to participate in specific approved volunteer activities or programs. All volunteer leave time must be requested in advance and must be approved by the employee's manager.

To use paid time off associated with volunteer activities, the volunteer opportunity must occur during a normally scheduled work day. Volunteer activities engaged in outside of normally scheduled work hours do not qualify.

Approval for volunteer leave time is contingent upon business needs.

More About Volunteer Leave

- Must be taken during the calendar year in which it is approved.
- Must be taken in whole hours up to 8 hours.
- May not be accrued or carried over to the next calendar year.
- Volunteer time should not conflict with the peak work schedule and other work-related responsibilities that may create a need for overtime or cause conflicts with other employees' schedules.
- Interested employees must be at a meets performance level or above.
- Projects and activities that qualify should be affiliated with a 501(c) 3 non-profit organization or public charity from the approved list and must relate to one of the following categories:
 - Education and job skills training and development
 - Neighborhood revitalization
 - Youth programs
 - Health and human needs
 - Civic improvement
 - Arts and culture

Purpose

- To provide opportunities for employees to support Laureate's values and mission of corporate stewardship and social change to foster an organizational environment that gives back to our local communities.

Employee Responsibilities

- Comply with all guidelines presented in the policy.
- Request volunteer time off at least two weeks prior to the volunteer event, for time agreed upon by completing a Request for Leave Form.
- Return to work if attendance at the volunteer activity is less than 8 hours.
- Provide your Manager with verification of your participation in the activity or event from the non-profit organization or public charity that is sponsoring the activity or event.
- Cannot be on performance plan.

Manager Responsibilities

- Inform employees of Laureate's commitment to serve our community and instruct them how to request hours under this policy.
- Approved volunteer hours, as required.
- Issue corrective action, up to and including termination, for violation of this policy.

Human Resources Responsibilities

- Ensure that this policy is applied consistently.

Unpaid Personal Leave of Absence

Policy

Employees who need extended time off from work for personal or other reasons, which do not qualify as Family and Medical Leave, may be permitted to take an unpaid leave of absence at Laureate's sole discretion, depending upon the circumstances. Laureate will not permit any leave of absence in excess of six months.

A leave of absence will not be granted to any employee with less than one year of continuous service, except for Military Leave. Submitting an unpaid leave form is not guaranteed and must be approved by three levels of management: The Human Resources Director or Vice President, the employee's immediate supervisor, and the Divisional Vice President.

An approved unpaid personal leave of absence does not assure an employee the right to return to work at Laureate or to return to the job he or she held. Although Laureate will try to place the employee in a job, Laureate is not obligated to do so. If Laureate does offer the employee a position at the end of the leave and the employee fails to accept it, he or she will be considered a voluntary resignation without notice.

Purpose

- To provide employees with the option for an unpaid leave of absence for personal reasons that do not fall under other Laureate leave alternatives.

Employee Responsibilities

- Submit all requests for a personal unpaid leave of absence in writing to their manager at the earliest possible date, except in an emergency.
- Indicate, as part of their request, the dates when they wish to begin and end their leave, the specific reasons for their request, and their intent to return to work.
- Provide evidence of the need for the unpaid personal leave of absence. (A leave of absence granted under false pretenses will result in termination of employment.)
- Obtain written approval from Laureate prior to working elsewhere for income. Failure to receive approval will result in termination of employment.
- Notify their manager and Human Resources of any change of address while on an unpaid personal leave of absence.

Manager Responsibilities

- Notify the employee requesting an unpaid personal leave of absence that there is no provision for job return. An approved unpaid personal leave of absence does not assure them the right to return to work at Laureate or to return to the job they had. Although Laureate will try to place employees in a job, it is not obligated to do so. If Laureate does offer an employee a position at the end of his or her leave and he or she fails to accept it, the employee will be considered as a voluntary resignation without notice.
- Inform the employee that if the leave is granted, his or her benefits will be discontinued and they will be offered COBRA through our administrator.
- Request approval from your next level of management, the Human Resources Director/Vice President and Divisional Vice President prior to granting an unpaid leave of absence. Inform the employee in writing whether the leave has been approved or denied.
- Request that all company property and equipment be returned prior to an employee going on leave.
- Complete the appropriate paperwork to place the employee on leave.

Human Resources Responsibilities

- Review and approve in writing all unpaid personal leaves of absence.
- Inform the COBRA administrator of the employee's eligibility for COBRA.

Workers' Compensation

Policy

Laureate pays all costs of providing workers' compensation insurance, which may benefit you if you become injured or ill as a result of your work. Workers' compensation laws vary from state to state. Laureate's insurance carrier will help in determining eligibility for benefits and job return provisions.

Purpose

- To provide certain benefits for employees who become injured or ill as a result of their job.
- To comply with state workers' compensation laws.

Employee Responsibilities

- Report any on-the-job injury or condition they believe is work-related to their manager immediately.

Manager Responsibilities

- Contact local emergency medical resources in the event of an illness or injury requiring immediate medical attention.
- Notify Human Resources immediately of any injury occurring on Laureate premises and/or while actively working for Laureate.
- Work with Human Resources to complete and submit workers' compensation forms to Human Resources.
- Contact Human Resources if they are unsure if an accident is work-related.
- Contact Human Resources with questions regarding workers' compensation or safety issues.
- Report work-related employee absences properly on the time sheet (eTime).

Human Resources Responsibilities

- Be available to work with managers to complete the appropriate paperwork and ensure it is filed appropriately with Laureate's workers' compensation claims administrator and any government agency, if required.
- Inform the manager and employee of any forms needed to be completed for extended leaves that result from a workers compensation injury.
- Coordinate insurance and benefits-related paperwork with the Benefits department.

Employee Assistance Program

Laureate provides a free and confidential employee assistance program (Business Health Services-BHS) for employees and their dependents to use when facing personal or professional challenges. Discussions with Business Health Services are not disclosed to Laureate staff.

A Complete Range Of Services

Emotional Well-Being

- Stress and depression
- Family matters
- Domestic violence
- Grief and loss

Everyday Issues

- Home remodeling and repair
- Purchasing a big-ticket item
- Help relocating to a new city
- House and apartment sitting

Legal Matters

- Divorce
- Landlord/tenant conflicts
- Criminal matters
- Wills/consumer issues

Financial Issues

- Credit management/budgeting
- Investments/retirement planning
- Insurance and taxes
- Emergency services

Education and Schooling

- Public vs. private school selection
- College searches/applications/scholarships
- Tutoring/school performance
- Finding special needs and gifted programs

Work Issues

- Co-worker relationships
- Job stability

Parenting and Child Care

- Becoming a parent/exploring adoption
- Child-care options and referrals
- Parenting skills
- Strategies for working parents

Resources for Seniors

- Elder-care options and referrals
- The aging process
- Long-distance caregiving
- Community programs and services

Disability and Accessibility

- Legal protections
- Community programs and services
- Living with a disability
- Caregiver support

Addiction and Recovery

- Substance abuse
- Eating disorders
- Treatment centers/detox centers
- Support groups/community services

Contact Business Health Services (BHS) at 800-765-3277.

Purpose

- To provide employees with a free and confidential resource for dealing with personal or professional challenges.

Employee Responsibilities

- Contact Business Health Services for assistance when necessary.
- Discuss any issues affecting their job performance with their manager or Human Resources.

Manager Responsibilities

- Advise employees of the availability of the Business Health Services program for help when work or personal issues affect job performance.
- Require that an employee contact Business Health Services in certain situations. When a mandatory referral is made, managers will work in conjunction with Human Resources to monitor employee progress and ensure legal compliance.

Human Resources Responsibilities

- Advise employees of the availability of the Business Health Services program for help when work or personal issues affect job performance.
- Work with managers to monitor employee progress when a mandatory referral is made.

Tuition Reimbursement Program

Policy

Regular full-time employees with at least six months of employment at Laureate are eligible for tuition reimbursement to pursue a job-related degree, license or certification. Laureate has the sole discretion to determine whether a course or program qualifies as job-related. Employees must obtain written management and Corporate Benefits approval prior to enrolling in a reimbursable course or program. Pre-approval of each course is required. Requests for reimbursement received without pre-approval will not be considered.

Reimbursement Terms

Eligible employees will be reimbursed for qualifying expenses up to \$2,500 in a calendar year upon successful completion of a job-related course with a grade of “B” or better. Certification of licensing programs must be passed or achieved in order to receive reimbursement. The \$2,500 benefit is allocated based on calendar year in which the course begins. Eligible classes include credit courses leading to an undergraduate degree, credit courses in a graduate or continuing studies program, and licensing or certification programs (also seminars relative to the licensing or certification program) that are job-related or deemed necessary for an employee’s current position or a position into which an employee is likely to be promoted (as determined by the manager in consultation with the Human Resources Department). All college courses must be taken at an accredited college/university.

Qualifying expenses are tuition, registration fees, lab fees and certification fees. **Books, parking, mileage, meals, supplies, late payment fees and all other fees are not covered under this policy.** In addition, conferences and seminars, although job related are not eligible for reimbursement under this program unless required in conjunction with a certification or licensing program. Refer to your manager for alternatives for conferences and seminars. This is strictly a reimbursement program, therefore, payments are not made in advance.

To Qualify for Tuition Reimbursement an Employee Must:

- Be a regular full-time employee with at least six months of employment at Laureate at the time the course or program begins and at the time of reimbursement.
- Receive prior management and Corporate Benefits approval before the start of each course.
- Take a course or program that is job-related.
- Pass the course with a “B” or better.
- Not be on any type of corrective action at the time of application.

Note: Pre-approval for reimbursement will not be considered if requests are submitted after a course begins. Reimbursements will not be paid if pre-approval was not received in writing by Corporate Benefits.

Employees (US-based) must be active full-time employees at the time of reimbursement and must sign a Promissory Note Agreement, at the time they submit the request for reimbursement, with a commitment of one year of continued employment with the company from the time of receiving each reimbursement.

Employees who resign or involuntarily separate from the company prior to completing one year of continued employment after receiving a tuition reimbursement must return to the company all or a portion of the reimbursement.

Employees who involuntarily separate from the company due to a reduction in force or separate for approved medical reasons will be exempt from returning the tuition reimbursement they received.

Purpose

- To develop the knowledge and skills of Laureate employees by promoting job-related education.
- To encourage the professional development of Laureate employees.

Employee Responsibilities

- Submit a pre-approval request application for tuition reimbursement to their manager and Corporate Benefits prior to the beginning of a course.
- Provide proof of grade and proof of payment for the course to Corporate Benefits within eight weeks of receiving the final grade. Reimbursement will not be made until this proof is received.
- Agree to repay all or a portion of the tuition reimbursement if they voluntarily resign or are terminated from Laureate within one year of the tuition reimbursement.

Manager Responsibilities

- Review and approve (or deny) pre-approval application for tuition reimbursement in a timely manner.
- Notify employees if the course on their pre-approval request is approved or denied.

Corporate Benefits Responsibilities

- Review and provide final approval (or deny) on the pre-approval request.
- Provide written pre-approval (or denied) confirmation.
- Submit completed approved reimbursement requests for payment.
- Ensure that this policy is applied consistently.

Higher Education Tuition Reduction Program

Regular full-time and part-time employees of Laureate Education, Inc. and its subsidiaries, and their immediate family members (spouse, domestic partner, children) are eligible to receive a tuition reduction benefit to pursue a degree at any LHEG University or College.

Purpose

To provide higher education opportunities to Laureate employees and their immediate family members and to promote the doctoral, masters, and bachelor's degree programs at any LHEG University or College.

Eligibility

All full-time and part-time Laureate Education, Inc. and affiliate employees (and their immediate family members) are eligible on the first day of employment for the tuition reduction benefit to help them earn a degree at any LHEG University or College as follows:

- 70% tuition reduction for full-time employees.
- 35% tuition reduction for part-time employees.
- 25% tuition reduction for immediate family members.

All Laureate employees and their immediate family members are subject to the regular admissions policies of the Universities. For the purposes of this policy, immediate family members include spouse or domestic partner and/or children. The employee (or family member) must complete an application form and be accepted for admission to the selected University prior to submitting the Laureate Higher Education Tuition Reduction Benefit form. There is a one-time approval for each course or program of study.

The employee must be in good standing with his/her University of employment and cannot be on written warning or probation at the time of enrollment of the benefit. Employees must also maintain satisfactory academic progress to maintain the tuition reduction.

Please note that the reduction applies to tuition only. Employees (or family members) are therefore required to pay for all other expenses, such as textbooks, supplies, and late payment fees.

Employees who receive the tuition reduction benefit for any LHEG University or College are NOT eligible to receive reimbursement for those courses under the **Laureate Tuition Reimbursement Program**.^{*} Employees that choose to attend other institutions of higher education may continue to be eligible for the Laureate Education Tuition Reimbursement Program.

If an employee leaves Laureate Education, Inc. or one of its affiliates, they (and their family members) are no longer eligible for future reductions under the Laureate Higher Education Tuition Reduction Benefit Program. Employees (US-based) must sign a Promissory Note Agreement, at the time they submit the application for the reduction, with a commitment of two years of continued employment with the company from the time of first receiving the tuition reduction. If an employee leaves the organization within the two years of first receiving the tuition reduction, he/she must repay the reduction in tuition he/she received under the following conditions:

- Employees who resign or involuntarily separate from the company within the first year of first receiving the tuition reduction must return to the company, 80 % of the tuition reduction. The tuition reduction repayment obligation after the first year, up to the second year, will be 50% of the tuition reduction.
- Employees who involuntarily separate from the company due to a reduction in force or separate for approved medical reasons will be exempt from returning the tuition reduction they received.
- Employees enrolled in a program with an LHEG University or College, prior to December 15, 2007, will be exempt from this repayment policy. However, these employees may be eligible for a graduation bonus, as described below.
- Employees who enroll in previously failed, incomplete or withdrawn courses will not receive a reduction in tuition for those courses.
- Employees who are on approved leave or have unusual circumstances, may have their accounts reviewed for adjustments or exceptions at the sole discretion of Laureate. Appropriate documentation is required.

In addition, if the employee's full-time or part-time employment status changes, the amount of the reduction for the employee, but not the family member, will also change accordingly.

Graduation Award: Employees that obtain a degree from any LHEG University or College and are employed on the day of graduation may earn a graduation award. This graduation award will apply to LHEG employees only. This graduation award will not apply those who graduate prior to 2008.

Employee Responsibilities

Upon admission to the Universities or Colleges, the Laureate employee or immediate family member completes the Laureate Higher Education Tuition Reduction Benefit form and sends it to the appropriate University for approval and processing. Once admitted to the University, the employee is responsible for obtaining the approval of his/her manager at the University of employment. It is the responsibility of the employee to obtain approvals of the appropriate offices listed on the form, including final approval from Human Resources. Applications for family members must be completed and signed by both the employee and the family member and submitted to the employee's manager/supervisor for approval. Approvals for the application of family members follow the same approval process for the employee.

Employees must forward their approved application(s) to the appropriate office for the next steps in processing.

Employees may obtain the application and promissory note from www.MyLaureate.com and must forward their approved application(s) to the appropriate office for the next steps in processing.

- Laureate Education, Inc.
Attention Bursar Office-Employee Tuition Reduction Benefit Program,
650 S. Exeter Street
Baltimore, MD 21202
- Laureate Online Education Amsterdam
Attention: Finance, Laureate Online Education, B.V.
De Entree 11-13
1101 BH Amsterdam Z.O.
The Netherlands
- Kendall College
Attention: Finance Department
900 N. North Branch Street
Chicago, IL 60642
312-752-2220
- NewSchool of Architecture & Design
Attention: Director, Business Services
1249 F Street
San Diego, CA 92101
619-684-8763
- College of Santa Fe
Attention: Business Office
1600 St. Michael's Drive

Manager Responsibilities

Review all applications for completeness and approve (or deny) applications for the Laureate Higher Education Tuition Reduction Benefit in a timely manner. Discuss the policy with the employees and answer questions, as necessary.

Bursar / Finance Responsibilities

The Bursar in Finance office the university or college receives the tuition reduction form, reviews and approves.

The Bursar/Finance hard codes the employee's (or family member's) student account at which point they receive the reduction for all courses they enroll in through their University of choice.

The Bursar/Finance is required to send a confirmation email, letter, or copy of the approved form to the employee (or family member) to show proof that they will receive the tuition reduction. If confirmation is not sent within 30 days of submitting the form, the employee (or family member) has a follow-up contact number, which is included on the Laureate Higher Education Reduction Benefit form.

The Bursar/Finance calculates and posts the actual tuition reduction to an applicant's student account.

A separated employee is responsible for the remaining unpaid balance on their student account, including the tuition reduction amount, as described, by the end of the term for which the reduction was granted. Failure to pay the remaining unpaid outstanding balance by the end of the term will result in the account being referred to the Collections Department. If the balance remains unpaid, the separated employee will be responsible for all collection charges incurred, including all reasonable legal fees associated with the collection of the unpaid balance.

Financial Aid Responsibilities

Financial Aid enters the Laureate Higher Education Tuition Reduction Benefit into the financial aid system. If necessary, financial aid awards may be adjusted.

Human Resources Responsibilities

Review application forms for completeness and accuracy, and place authorized signature on the form.

It is the responsibility of the Human Resources Department at each University or College to notify the appropriate party of any changes in employee status. The employee exiting process should be followed when an employee leaves the company/University with notification going to the appropriate Bursar or Finance office, as appropriate.

* The **Laureate Tuition Reimbursement Program** only applies to full-time regular (US-based) employees with at least 6 months of full-time employment. This program covers 100% tuition up to \$2,500 per year for college credit courses taken at an accredited institution leading to an undergraduate or graduate level degree, continuing education courses that are job related and job related certification/licensing programs.

Relocation

In certain situations, employees who relocate at the company's request may be eligible for Laureate-sponsored relocation. Employees should work with Human Resources to determine eligibility for relocation and coordinate all relocations.

Purpose

- To provide assistance for eligible employees who relocate at the company's request.
- To provide a consistent framework for all company-sponsored relocations.

Employee Responsibilities

- Consult with their manager and Human Resources to determine relocation eligibility and to discuss specific relocation provisions.
- Work with the relocation vendor to ensure that expenses are approved and submitted on a timely basis.
- Sign an agreement to return all or a portion of the relocation costs if they voluntarily leave Laureate or are terminated for gross misconduct within one year of the relocation.
- Must use company vendor for all relocations.

Manager Responsibilities

- Obtain approvals from Human Resources prior to offering relocation to an employee.
- Work in conjunction with Human Resources to communicate relocation eligibility and policy provisions.

Human Resources Responsibilities

- Coordinate all relocations based on policy provisions.
- Ensure the consistent application of the relocation policy.
- Develop and maintain Laureate's relocation policy and select appropriate vendors to administer relocation.

APPENDIX



ACKNOWLEDGEMENT

I acknowledge that I have been advised that Laureate Education, Inc. (“Laureate”) has an employee handbook which sets forth various policies regarding my employment by Laureate. I acknowledge that I have access to and can obtain a copy of the Laureate Education, Inc. Employee Handbook for review at any time online through www.MyLaureate.com, as demonstrated in my New Hire Orientation, or by contacting my Human Resources representative or manager. I understand and agree that it is my responsibility to familiarize myself with and abide by the policies set forth in that handbook. I also understand that, with the exception of the express at-will agreement, the handbook does not create a contract of employment, either express or implied, or a guarantee of any benefit, and that the handbook contains only a summary of benefits and an overview of Laureate policies and practices.

I further understand that the at-will agreement can only be changed in writing by the company’s Chief Executive Officer or the CEO’s designated representative. I understand that all Laureate policies, practices, wages and benefits, whether they are in the handbook or not, may be unilaterally changed, amended, modified, reduced or discontinued by Laureate at any time at its sole judgment and discretion. I also understand that any amendment of the handbook will always govern and supersede any prior version.

Further, I understand, in accordance with the handbook policies, that if I should have questions or concerns regarding my terms of employment or working conditions with Laureate, that I should contact my Human Resources representative or a member of management.

Finally, I agree that my employment with Laureate is and continues to be at-will and for no definite duration, that I can terminate my employment with Laureate at any time, with or without cause or notice, and that Laureate reserves the right to do the same.

Employee Name

Employee Signature

Date