

Harassment and Discrimination (Revised: 10/30/2009)

Purpose It is the policy of Huron Consulting Group (the Company) to maintain a safe and professional work environment free of harassment and discrimination for all of its employees.

Coverage All employees

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

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

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

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

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Definition of Harassment (continued)

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

Harassment on the basis of sex consists of unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, or written, graphic, or visual material of a sexual nature. Huron Consulting Group considers the following conduct to constitute sexual harassment:

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

Sexual Harassment

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

- Sexual remarks, jokes, or other sexual conduct that interferes with another person's work performance or creates an intimidating, hostile or offensive work environment;
- Display of sexually suggestive objects or pictures;
- Personnel decisions by supervisors regarding promotions, raises or scheduling based on an individual's submission to or rejection of sexual advances;
- Submission to a sexual advance used as a condition of keeping or getting a job, whether expressed in explicit or implicit terms;
- Unwanted sexual advances or propositions, whether verbal or otherwise;
- Offering employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons or posters;
- Making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about an individual's body or dress;

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**Sexual
Harassment
(continued)**

- Written communications of a sexual nature distributed in hard copy or via a computer network;
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, suggestive or obscene letters, notes, pictures, or invitations;
- Physical conduct, including inappropriate touching, assault, impeding or blocking movements.

These behaviors are unacceptable both in the workplace and in any work-related setting outside the workplace such as during business trips, business meetings or business-related social events.

It is unlawful for males to sexually harass females or other males, and for females to sexually harass males or other females. Sexual harassment on the job is unlawful whether it involves coworker harassment, harassment by a supervisor or manager, or by persons, including customers or clients, doing business with or for the Company.

**Internal
Complaint
Procedure**

Huron Consulting Group has adopted an Internal Complaint Procedure in order to assist it in fulfilling its commitment to preventing discrimination and harassment.

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

Any individual who (1) believes that he or she has been subjected to harassment or other discriminatory treatment, or (2) believes that he or she has witnessed harassment or other discriminatory treatment, must bring this to the attention of the Vice President of Human Resources, the General Counsel, any of the Managing Directors, or your supervisor.

Complaints may be made orally or in writing and should be reported immediately.

Any supervisor who receives a complaint of a violation of this policy must report the complaint immediately to the Vice President of Human Resources.

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Investigation, Disciplinary Action and Confidentiality

Complaints or reports of harassment or discrimination will be investigated thoroughly, promptly, impartially, and discreetly. The facts of each case will determine the response to each allegation. Appropriate disciplinary action, up to and including discharge, will be taken if it is determined that an employee has violated the Company's policy on harassment and discrimination. Any failure to fully cooperate could lead to disciplinary action up to and including termination of employment.

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

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

Prohibition against Retaliation

Huron Consulting Group strictly prohibits retaliation against any person by another employee or by the Company for using this complaint procedure, reporting harassment, or for filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by the Company or a governmental enforcement agency.

Prohibited retaliation includes, but is not limited to:

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

If any employee believes that she or he has been subjected to retaliation for having brought or supported a complaint of harassment, he/she must report the situation immediately to the Vice President of Human Resources. Any report of retaliatory conduct will be objectively, timely and thoroughly investigated in accordance with the Company's investigation procedure outlined above. Any individual who has been found to engage in

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**Prohibition
against
Retaliation
(cont'd.)**

such retaliation against another employee will be subject to appropriate corrective or disciplinary action up to and termination.

If the Company determines that retaliation has occurred, remedial action will be taken, commensurate with the severity of the offense. Appropriate action will also be taken to deter any future retaliation. The Company will not retaliate against any employee for filing a complaint and will not knowingly permit retaliation by management, employees or coworkers.

**False
Accusations**

Huron Consulting Group recognizes that the question of whether a particular course of conduct or set of circumstances constitutes unlawful harassment requires a factual determination.

The Company also recognizes that false accusations can have serious effects on innocent persons. If an investigation results in a finding that a person who has accused another of harassment has maliciously or recklessly made false accusations, the accuser will be subject to appropriate sanctions, up to and including dismissal.

**Complaints
to Outside
Agencies**

In addition to the Company's internal complaint procedure, employees should also be aware that the federal Equal Employment Opportunity Commission (EEOC) and applicable state agencies investigate and prosecute complaints of sexual harassment in employment. A charge with the EEOC must be filed within 300 days of the incident.

The United States Equal Employment Opportunity Commission can be contacted as follows:

- CHICAGO 312-353-2713
- 800-669-3362
- TDD 800-800-3302

California
California Department of Fair Employment and Housing (DFEH)
1-800-884-1684

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**Complaints to
Outside
Agencies**

An employee who is suddenly transferred to a lower paying job or passed over for promotion after filing a complaint may file a retaliation charge with either of these agencies.

An employee who has been physically harassed or threatened while on the job may also have grounds for criminal charges of assault and battery.

**Violation of
Policy**

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

The Company does not consider conduct in violation of this policy to be within the course and scope of employment and does not sanction such conduct on the part of any employee, including management employees.

**Related
Policies**

Equal Employment Opportunity and Affirmative Action Commitment Policy
