

 AMERICAN INTERNATIONAL UNIVERSITY الجامعة الأمريكية الدولية	Policy Main Title	Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	Effective Date	14/06/2026
	Category	Institutional Governance / Compliance	Last Review date	
	Policy Number	ADM-003	Next Review date	14/06/2029
	Responsible Entity	Office of President	Approved By	President

Overview

AIU is committed to maintaining a campus environment in which every member of the university community, student, faculty member, staff, administrator, contractor, and visitor, is treated with dignity and respect, and in which no person is subjected to discrimination, harassment, bullying, or sexual misconduct. This commitment is not aspirational language. It describes a concrete institutional obligation that shapes every aspect of the University's educational programs, employment practices, and community life.

This policy is grounded in the applicable provisions of Kuwait Law No. 16 of 1960 (Penal Code, as amended) and Kuwait Law No. 2 of 2001 (Cybercrime Law). AIU operates within Kuwait's legal environment and is accountable to Kuwait law as well as to its own institutional standards. Institutional disciplinary proceedings under this policy are independent of and may proceed simultaneously with any criminal proceedings under Kuwait law, the outcome of one does not determine the other. The policy is further informed by the equal opportunity and non-discrimination frameworks of accredited institutions, which are expected to demonstrate, not merely assert, that their programs and employment practices are free from unlawful discrimination. Kuwait law prohibits harassment and indecent conduct.

Scope

This policy applies to all members of the AIU community, students, full-time and part-time faculty, administrative staff, visiting faculty, contractors, volunteers, and visitors, in all AIU-related activities and contexts. It applies on AIU's campus premises, at all University-sponsored activities on or off campus, in all digital and online environments operated by or connected to AIU, and to off-campus conduct that has a direct and material effect on the University community or creates a hostile environment on campus for any community member.

This policy applies regardless of the position, status, or seniority of the person engaging in the prohibited conduct. A senior faculty member who harasses a student or junior colleague is subject to this policy in precisely the same way as any other community member. The University treats the exercise of institutional authority as an aggravating rather than a mitigating factor where the respondent holds a position of power over the complainant.

Purpose

The purposes of this policy are to:

- Affirm AIU's institutional commitment to equal opportunity in education and employment, and to a campus environment free from discrimination, harassment, bullying, and sexual misconduct
- Define the protected characteristics that may not be the basis for discriminatory or harassing conduct at AIU
- Define with precision the categories of prohibited conduct, discrimination, harassment, bullying, cyber-harassment, sexual harassment, sexual misconduct, and retaliation, drawing on the frameworks of accredited institutions

 AMERICAN INTERNATIONAL UNIVERSITY الجامعة الأمريكية الدولية	Policy Main Title	Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	Effective Date	14/06/2026
	Category	Institutional Governance / Compliance	Last Review date	
	Policy Number	ADM-003	Next Review date	14/06/2029
	Responsible Entity	Office of President	Approved By	President

- Establish the Equal Opportunity Officer role and the complaint, investigation, and determination process through which complaints are handled fairly, impartially, and confidentially
- Define the interim measures available to protect complainants and witnesses during investigations
- Define the range of sanctions available for confirmed violations, scaled to the severity of the conduct
- Establish the mandatory reporting obligations of faculty and staff who become aware of conduct prohibited by this policy
- Establish the prevention, training, and awareness program that builds the equal opportunity culture this policy describes
- Demonstrate compliance with fair and equitably applied policies, sound and ethical institutional operations, and student rights and grievance procedures

Definitions and Abbreviations

Equal Opportunity: The right of every person to access AIU's educational Programs and employment opportunities without discrimination based on a protected characteristic, and to participate in campus life without being subjected to conduct that violates the standards of this policy.

Protected Characteristic: A characteristic that may not be the basis for discriminatory or harassing treatment at AIU. Protected characteristics are identified in Article 2 of this policy.

Discrimination: Treating a person less favourably, or placing them at a disadvantage, on the basis of a protected characteristic, in connection with any aspect of their educational participation or employment at AIU.

Harassment: Unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment. Harassment is assessed from both the perspective of the complainant (subjective standard) and the standard of a reasonable person in the complainant's position (objective standard).

Non-Academic Grievance: A formal complaint about an administrative or service matter, including the incorrect application of a University policy or procedure, a service failure, or a financial account dispute.

Bullying: Repeated, targeted, aggressive conduct, verbal, written, physical, or digital, that causes emotional distress to a reasonable person in the target's position and substantially impairs the target's ability to study, work, or participate in university activities. Bullying is characterised by its repetitive nature, its deliberate targeting of a specific person, and its effect of causing real distress to a person in the target's circumstances.

Sexual Harassment: Unwanted conduct of a sexual nature that violates a person's dignity or creates a hostile environment, as more fully defined in Article 3 of this policy. Drawn applicable Kuwait law.

Hostile Environment: An environment that a reasonable person in the complainant's position would find hostile, intimidating, humiliating, or offensive, and that the complainant does find hostile or offensive. The determination considers the frequency, severity, and cumulative effect of the conduct; whether it involves a threat or use of physical force; and whether it has materially impaired the target's ability to participate in University programs or activities.

Equal Opportunity Officer (EOO): The designated institutional officer responsible for administering this policy, receiving complaints, managing investigations, and coordinating training and prevention activities. The EOO reports to the VP Administration.

	Policy Main Title	Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	Effective Date	14/06/2026
	Category	Institutional Governance / Compliance	Last Review date	
	Policy Number	ADM-003	Next Review date	14/06/2029
	Responsible Entity	Office of President	Approved By	President

Complainant: The person who reports or files a complaint under this policy, alleging that conduct prohibited by this policy has occurred.

Respondent: The person against whom a complaint is filed under this policy.

Interim Measure: A temporary protective action taken before the conclusion of an investigation to protect the complainant, witnesses, or the integrity of the investigation, not a sanction and not a finding of responsibility.

Confidentiality: The obligation of all persons involved in a complaint process under this policy to handle all information about the complaint, the parties, and the proceedings with discretion, disclosing only to persons with a legitimate need to know for the purpose of resolving the complaint.

Mandatory Reporter: A faculty member, administrator, or staff member who holds a role that triggers an obligation to report to the EOO when they become aware of conduct prohibited by this policy in their professional capacity. Mandatory reporters are identified in Article 6 of this policy.

Policy

Article 1: Institutional Commitment

AIU is committed to the following principles as the foundation of its equal opportunity and non-discrimination Program:

- No person is admitted to, excluded from, or disadvantaged in any AIU educational Program on the basis of any protected characteristic. Admission, academic evaluation, academic progression, graduation requirements, and access to all educational services are governed by academic standards applied consistently without discrimination.
- No person is employed, denied employment, disadvantaged in employment, promoted, demoted, compensated, evaluated, disciplined, or terminated from employment at AIU on the basis of any protected characteristic. Employment decisions at AIU are based on merit, qualifications, and institutional need, not on protected characteristics.
- No person is subjected to harassment, bullying, sexual harassment, sexual misconduct, or retaliation by any member of the AIU community. The University maintains a safe, respectful, and dignified environment for all members of its campus community.
- AIU takes all complaints of discrimination, harassment, bullying, and sexual misconduct seriously. Every complaint is acknowledged, investigated promptly and impartially, and resolved with a written determination. The seriousness with which AIU treats a complaint is not reduced because the complaint is about a person of seniority, or because the complainant is less senior than the respondent.
- The institutional response to confirmed violations is proportionate to their severity. Where conduct is confirmed, AIU acts, not only to sanction the respondent, but to prevent the conduct from recurring and to address the harm caused to the complainant and to the wider community where relevant.

 AMERICAN INTERNATIONAL UNIVERSITY الجامعة الأمريكية الدولية	Policy Main Title	Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	Effective Date	14/06/2026
	Category	Institutional Governance / Compliance	Last Review date	
	Policy Number	ADM-003	Next Review date	14/06/2029
	Responsible Entity	Office of President	Approved By	President

Article 2: Protected Characteristics

The following characteristics are protected under this policy. No person may be subjected to discrimination, harassment, bullying, or any other conduct prohibited by Article 3 on the basis of any of these characteristics:

Protected Characteristic	Application at AIU
Sex and gender	All persons regardless of sex; includes protections against sexual harassment, sexual misconduct, and gender-based discrimination. AIU's campus community includes students of both sexes.
Nationality and national origin	All persons regardless of their country of citizenship or origin. AIU's community is multinational; national origin discrimination undermines the educational environment for all
Religion	All persons regardless of their religious beliefs or practice, within the framework of Kuwait law. AIU respects religious diversity within the limits of applicable law and the rights and dignity of all campus community members
Age	All persons within the student, faculty, and staff community regardless of age, subject to lawful minimum age requirements for enrolment or employment
Disability	All persons with a physical or cognitive impairment that substantially limits a major life activity, in academic participation, employment, or physical access to facilities.
Social or family status	All persons regardless of their family background, marital status, or social status, within the framework of applicable Kuwait law
Academic rank or employment classification	All persons regardless of whether they are full-time or part-time, tenured or contract, senior or junior in the institutional hierarchy. This protection specifically applies to bullying and harassment along hierarchical lines, a

 AMERICAN INTERNATIONAL UNIVERSITY الجامعة الأمريكية الدولية	Policy Main Title	Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	Effective Date	14/06/2026
	Category	Institutional Governance / Compliance	Last Review date	
	Policy Number	ADM-003	Next Review date	14/06/2029
	Responsible Entity	Office of President	Approved By	President

	senior faculty member who bullies a junior colleague is in violation of this policy
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This list reflects AIU's institutional commitments within the framework of applicable Kuwait law. Where Kuwait law provides for additional protected characteristics or imposes additional obligations, those apply in addition to and not in substitution for this policy. The fact that a characteristic is not explicitly listed does not mean that targeting a person based on that characteristic is acceptable, the University's core commitment to dignity and respect applies to all persons regardless of whether a specific characteristic is named.

Article 3: Prohibited Conduct

The following categories of conduct are prohibited at AIU. All community members, regardless of role or status, are prohibited from engaging in any of these conduct types. Each category is specified with sufficient precision for a community member to understand what is prohibited:

Category	Definition and Examples	Legal Reference
A: Discrimination		
Direct discrimination	Treating any person less favorably because of a protected characteristic, for example, denying a student access to a Program, failing to consider an employment application, or applying a different standard of assessment on the basis of a protected characteristic	Kuwait Penal Code; PUC regulations; AIU Charter
Indirect discrimination	Applying a provision, criterion, or practice that appears neutral but disproportionately disadvantages persons with a protected characteristic, where the provision is not justified by a legitimate institutional objective	Kuwait Penal Code; PUC regulations
B: Harassment (General)		

 AMERICAN INTERNATIONAL UNIVERSITY الجامعة الأمريكية الدولية	Policy Main Title	Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	Effective Date	14/06/2026
	Category	Institutional Governance / Compliance	Last Review date	
	Policy Number	ADM-003	Next Review date	14/06/2029
	Responsible Entity	Office of President	Approved By	President

Harassment	Unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment, whether expressed verbally, in writing, electronically, or through gesture or conduct	Kuwait Penal Code Art. 198–201.
Bullying	Repeated, targeted, aggressive conduct directed at another person, verbal, written, physical, or electronic, that causes demonstrable emotional distress and substantially impairs the target's ability to study, work, or participate in university activities. Single isolated incidents that are sufficiently severe may also constitute bullying. Includes: name-calling and verbal abuse; spreading false information or rumors; deliberate social exclusion; mockery, ridicule, and deliberate public humiliation; physical pushing, hitting, or threatening contact; cyberbullying through any digital channel	Kuwait Penal Code
Cyber-harassment	Harassment, bullying, or threats conducted through digital channels, including email, messaging applications, social media, online forums, or any electronic platform, whether using real names or anonymous accounts. The digital character of the conduct does not diminish its seriousness. Cyber-harassment that targets University community members is a violation of this policy regardless of whether the digital activity occurs on or off campus	Kuwait Law No. 2 of 2001 (Cybercrime Law)
C: Sexual Harassment and Sexual Misconduct		

 AMERICAN INTERNATIONAL UNIVERSITY الجامعة الأمريكية الدولية	Policy Main Title	Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	Effective Date	14/06/2026
	Category	Institutional Governance / Compliance	Last Review date	
	Policy Number	ADM-003	Next Review date	14/06/2029
	Responsible Entity	Office of President	Approved By	President

Sexual harassment	Any unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, or offensive environment. Includes: explicit or implicit requests for sexual favors; uninvited sexual advances; sexually suggestive comments about a person's appearance, body, or behavior; display of sexually suggestive material; sexual jokes, gestures, or signals; persistent unwanted contact; stalking for sexual purposes; and sexual harassment conducted through electronic media. Applies regardless of the sex or gender of the complainant or the respondent	Kuwait Penal Code
Quid pro quo sexual harassment	Conditioning access to an educational benefit, employment decision, favorable grade, accommodation, or any other institutional benefit on the acceptance of unwanted sexual conduct, or making explicit or implicit threats of adverse consequences for refusing sexual conduct	Kuwait Penal Code
Sexual misconduct	Non-consensual physical contact of a sexual nature, any uninvited physical touching of a sexual character that has not been consented to by the person being touched. Aggravated where accompanied by force, threat, intimidation, or the exercise of authority over the victim	Kuwait Penal Code Art. 186, 190
Sexual assault	Any act that constitutes rape or sexual assault as defined under Kuwait law. Sexual assault is simultaneously a criminal offence under Kuwait law and a violation of this policy. AIU's institutional process proceeds independently of any criminal proceedings	Kuwait Penal Code Art. 186–191

 AMERICAN INTERNATIONAL UNIVERSITY الجامعة الأمريكية الدولية	Policy Main Title	Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	Effective Date	14/06/2026
	Category	Institutional Governance / Compliance	Last Review date	
	Policy Number	ADM-003	Next Review date	14/06/2029
	Responsible Entity	Office of President	Approved By	President

D: Retaliation

Retaliation	Any adverse action, in employment, academic standing, institutional access, social standing, or any other dimension of university life, taken against a person because they reported conduct prohibited by this policy, participated in an investigation, appeared as a witness, or supported another person in using this policy. Retaliation is independently actionable as a serious violation of this policy	GOV-003 Whistleblower Protection Policy
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Conduct does not need to be intended to cause harm to constitute harassment or bullying under this policy. Where a reasonable person in the complainant's position would find the conduct hostile, degrading, or offensive, the perpetrator's claimed lack of harmful intent does not resolve the question. The effect of the conduct on the complainant, assessed against a reasonable person standard, is the primary test.

The conduct categories in this policy represent serious violations of institutional standards. They do not criminalize robust academic debate, professional criticism, or the expression of genuine academic or professional judgments. Academic freedom, as protected under ACA-002, is not a defense for conduct that targets a person based on a protected characteristic or subjects them to harassment, bullying, or sexual misconduct.

Article 4: Roles and Responsibilities

Equal opportunity is a shared institutional responsibility. The following roles hold specific obligations under this policy:

Role	Equal Opportunity Responsibilities
President	Holds ultimate institutional accountability for the equal opportunity environment; approves all senior-level sanctions; receives the annual equal opportunity report; ensures adequate resources for the equal opportunity Program

 AMERICAN INTERNATIONAL UNIVERSITY الجامعة الأمريكية الدولية	Policy Main Title	Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	Effective Date	14/06/2026
	Category	Institutional Governance / Compliance	Last Review date	
	Policy Number	ADM-003	Next Review date	14/06/2029
	Responsible Entity	Office of President	Approved By	President

Equal Opportunity Officer (EOO)	Designated institutional officer responsible for receiving and processing complaints under this policy; conducting or supervising investigations; advising on interim measures; maintaining the complaint register; delivering training; reporting to the President and Board. The EOO reports to the VP Administration and has direct access to the President where matters warrant. The EOO position may be held by the VP Administration or a designated officer within that office
VP Administration	Oversees the equal opportunity Program; receives appeals from non-academic complaints; ensures policy compliance across administrative units; approves non-academic sanctions
Vice President for Academic Affairs	Receives appeals on academic Program-related complaints; ensures faculty and academic staff compliance; coordinates with the EOO on complaints involving academic personnel
Vice President for Student Affairs	First point of contact for student complaints; provides support and information on this policy and on available resources; coordinates interim protective measures for students; reports student-related matters to the EOO
HR Director	First point of contact for employee complaints; provides HR-related interim measures; coordinates with the EOO on complaints involving employees; implements employment-related sanctions
Deans and Department Chairs	Responsible for maintaining an equal opportunity environment within their units; mandatory reporting of suspected violations that come to their attention in their supervisory capacity; may not handle complaints informally without EOO involvement where the matter involves prohibited conduct under this policy
All Faculty, Staff, and Contractors	Personal obligation not to engage in any conduct prohibited by this policy; obligation to report violations they directly witness or are told

 AMERICAN INTERNATIONAL UNIVERSITY الجامعة الأمريكية الدولية	Policy Main Title	Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	Effective Date	14/06/2026
	Category	Institutional Governance / Compliance	Last Review date	
	Policy Number	ADM-003	Next Review date	14/06/2029
	Responsible Entity	Office of President	Approved By	President

	about in their professional capacity; completion of mandatory equal opportunity training
Students	Personal obligation not to engage in any conduct prohibited by this policy; obligation to cooperate with investigations; access to complaint process

Article 5: Complaint Process

AIU provides a complaint process that is genuine, accessible, impartial, and prompt. Every person who experiences or witnesses conduct prohibited by this policy may use this process. Participation in this process, as a complainant, witness, or support person, is protected from retaliation under Article 9.

5.1 Initial Advice and Support

Any member of the AIU community who believes they have experienced conduct prohibited by this policy may seek advice, support, and information without committing to a formal complaint. Students may contact the Vice President for Student Affairs; employees may contact the HR Director or the EOO directly. The Vice President for Student Affairs and HR Director are trained to provide confidential initial support, to explain the options available under this policy, and to connect individuals to the EOO. Seeking advice does not trigger a formal complaint, only the complainant's decision to file a formal complaint initiates the formal process.

5.2 Immediate Action and Interim Measures

Where the EOO or the Vice President for Student Affairs receives a report of conduct that poses an ongoing risk to the safety or well-being of any campus community member, interim protective measures are implemented without waiting for the outcome of a full investigation. Available interim measures include:

- A no-contact order prohibiting direct or indirect contact between specified parties
- A temporary restriction on the respondent's access to specific campus facilities or activities
- A temporary change in class assignment, work schedule, or office location to reduce the likelihood of contact between the parties
- A temporary campus residential reassignment where the complainant lives on campus
- A temporary suspension from campus in cases of credible, serious risk to safety, not a sanction, and implemented without prejudice to the outcome of the investigation

Interim measures are reviewed and lifted, modified, or extended based on the development of the complaint process. The complainant and the respondent are both informed of any interim measure and

 AMERICAN INTERNATIONAL UNIVERSITY الجامعة الأمريكية الدولية	Policy Main Title	Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	Effective Date	14/06/2026
	Category	Institutional Governance / Compliance	Last Review date	
	Policy Number	ADM-003	Next Review date	14/06/2029
	Responsible Entity	Office of President	Approved By	President

its basis. The respondent may request a review of an interim measure by the EOO within 5 working days of its implementation.

5.3 Informal Resolution

For lower-severity matters, particularly harassment and bullying where the complainant primarily seeks cessation of the conduct, informal resolution is available as an alternative to formal complaint. Informal resolution is not available for: sexual misconduct or sexual assault; complaints involving a significant power differential where informal resolution would not protect the complainant's interests; or situations where interim safety measures are already in place. Informal resolution is facilitated by the EOO and may include mediation, a structured conversation, or a written agreement for behavior change. The complainant may withdraw from informal resolution at any time and proceed to formal complaint. A successfully informally resolved complaint may not be re-filed on the same facts absent a breach of the resolution terms.

5.4 Formal Complaint

A formal complaint is submitted in writing to the EOO. The complaint must identify the complainant, describe the conduct alleged with reasonable specificity including dates and context, identify the respondent, and state the remedy sought. The complaint must be filed within 40 working days of the conduct giving rise to it (or within 15 working days of failed informal resolution). The EOO may extend the filing deadline where the complainant demonstrates that the conduct was not discoverable within the standard period.

The formal complaint initiates the investigation process. The EOO acknowledges receipt within 3 working days, notifies the respondent within that same period, and requests a written response from the respondent within 10 working days.

5.5 Confidentiality Requests

A complainant may request confidentiality, that their identity not be disclosed to the respondent. The EOO considers this request alongside the University's obligation to investigate and to maintain a safe campus environment. Factors considered include: the severity and nature of the conduct; whether there are other complaints against the same respondent; the risk of ongoing harm; and whether an effective investigation is possible without disclosing the complainant's identity. The EOO communicates to the complainant what steps can and cannot be taken while maintaining confidentiality. Honoring a confidentiality request may limit the University's ability to investigate and respond fully, the complainant is advised of this consequence before the decision is confirmed.

 AMERICAN INTERNATIONAL UNIVERSITY الجامعة الأمريكية الدولية	Policy Main Title	Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	Effective Date	14/06/2026
	Category	Institutional Governance / Compliance	Last Review date	
	Policy Number	ADM-003	Next Review date	14/06/2029
	Responsible Entity	Office of President	Approved By	President

Article 6: Investigation

Every formal complaint under this policy is investigated. Investigation is conducted by or under the supervision of the EOO. For complaints involving senior administrators, including the EOO themselves, an external independent investigator may be appointed by the President.

6.1 Investigation Process

The investigation includes: a review of all relevant documents and records; separate interviews with the complainant, the respondent, and all relevant witnesses; collection and analysis of any digital, physical, or other relevant evidence; and, where appropriate, consultation with subject-matter experts. Both parties have access to the evidence gathered during the investigation before the investigation report is finalized, and may submit responses to any adverse information. Both parties have the right to identify witnesses and to have those witnesses interviewed where the EOO determines they are relevant.

The investigation report documents: the facts established; the evidence assessed and its weight; the applicable policy provisions; and a finding on whether the conduct is established on the balance of probabilities. The balance of probabilities standard means that the conduct is more likely than not to have occurred as alleged.

6.2 Independence and Fairness

Every person who investigates a complaint under this policy must be free from any personal connection to either party and must have no prior involvement in the matters being investigated. Either party may request the EOO to recuse an investigator on grounds of conflict of interest. The EOO adjudicates the recusal request; where the EOO is the subject of the recusal request, the VP Administration adjudicates. Investigations are conducted with equal fairness to all parties. The investigation is not an adversarial proceeding, it is an institutional fact-finding process.

6.3 Mandatory Reporting

The following persons have a mandatory obligation to report to the EOO whenever they become aware in their professional capacity of conduct that may constitute a violation of this policy:

- Deans and Department Chairs, mandatory reporters for conduct involving any person in their academic unit
- HR Director, mandatory reporter for conduct involving any employee
- Vice President for Student Affairs, mandatory reporter for conduct involving students
- Any faculty member who is a designated Program director or supervisor, mandatory reporter for conduct involving persons within their supervisory responsibility
- Any administrative manager or director, mandatory reporter for conduct involving persons within their administrative area

 AMERICAN INTERNATIONAL UNIVERSITY الجامعة الأمريكية الدولية	Policy Main Title	Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	Effective Date	14/06/2026
	Category	Institutional Governance / Compliance	Last Review date	
	Policy Number	ADM-003	Next Review date	14/06/2029
	Responsible Entity	Office of President	Approved By	President

A mandatory reporter who becomes aware of conduct that may constitute sexual assault under Kuwait law must report immediately to the EOO, who determines whether an immediate notification to the Public Security Department is required. A mandatory reporter's failure to report a known violation is itself a violation of this policy and is subject to disciplinary action. Confidential counselling and mental health support staff are not mandatory reporters for information received in their professional counselling capacity.

Article 7: Determination and Sanctions

The EOO issues a written determination following the investigation. The determination states: the finding (substantiated or unsubstantiated) on each allegation; the evidence that supports the finding; where the finding is substantiated, the recommended sanction and the rationale for that recommendation; and the appeal rights of both parties. For severe matters, including sexual assault, sexual misconduct, and cases involving potential dismissal, the determination is made by the President upon the EOO's recommendation, after the President has reviewed the investigation file.

Sanction	Description	Applicable To
Student Sanctions		
Written warning	Formal warning recorded in the conduct file, with specific requirements to cease the conduct	First-time lower-severity violations
Mandatory education Program	Required completion of an AIU equal opportunity awareness Program or other specified education	Category A and B violations; may accompany other sanctions
No-contact order	Formal prohibition on any direct or indirect contact between the respondent and the complainant	All harassment and misconduct categories
Restriction of access to activities or facilities	Temporary or permanent exclusion from specific campus facilities, events, or activities	Category B violations; may accompany other sanctions

 AMERICAN INTERNATIONAL UNIVERSITY الجامعة الأمريكية الدولية	Policy Main Title	Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	Effective Date	14/06/2026
	Category	Institutional Governance / Compliance	Last Review date	
	Policy Number	ADM-003	Next Review date	14/06/2029
	Responsible Entity	Office of President	Approved By	President

Suspension	Temporary exclusion from AIU for a defined period	Category B serious; Category C
Dismissal	Permanent exclusion from AIU	Category C; repeated Category B violations
Employee Sanctions		
Formal written warning	Written warning on the employment record	First-time lower-severity violations
Mandatory training	Required completion of specified training within a defined period, with verification	All violations
No-contact order	Prohibition on contact with the complainant, including through intermediaries	All harassment and misconduct categories
Reassignment or transfer	Temporary or permanent change of teaching assignment, office location, or administrative role	Where necessary to protect the complainant from further exposure
Suspension without pay	Temporary suspension from duties without pay for a defined period	Serious Category B and C violations
Termination	Dismissal from employment at AIU	Category C; serious repeated violations; cases involving abuse of hierarchical authority

Sanctions are selected to be proportionate to the nature and severity of the confirmed conduct, the respondent's prior conduct record, the harm caused to the complainant and the broader community, and the presence of any mitigating or aggravating circumstances. The exercise of hierarchical authority over a complainant, where the respondent is a supervisor, instructor, or administrator in relation to the

 AMERICAN INTERNATIONAL UNIVERSITY الجامعة الأمريكية الدولية	Policy Main Title	Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	Effective Date	14/06/2026
	Category	Institutional Governance / Compliance	Last Review date	
	Policy Number	ADM-003	Next Review date	14/06/2029
	Responsible Entity	Office of President	Approved By	President

complainant, is always an aggravating circumstance. Sanctions are applied consistently regardless of the seniority or status of the respondent.

Article 8: Appeals

Both parties, the complainant and the respondent, may appeal a determination under this policy. The following grounds for appeal are recognized:

- a. A material procedural error in the investigation or determination process that prejudiced the outcome
- b. The determination was not supported by the evidence
- c. New material evidence has emerged that was not available during the investigation
- d. The sanction is clearly disproportionate to the confirmed conduct

The appeal is submitted in writing to the EOO within 10 working days of the determination, specifying the grounds relied on. The appeal is reviewed by the VPAA (for matters primarily involving academic contexts) or the VP Administration (for matters primarily involving employment or administrative contexts), or by the President where the VP concerned is conflicted. The appeal reviewer does not conduct a new investigation, they review whether the process was fair and the determination was supported by the evidence. The appeal reviewer's determination is issued within 20 working days and is final at the administrative level. Where the appeal relates to a determination made by the President, the Board Academic Affairs Committee serves as the final level of review.

Article 9: Non-Retaliation

No person who reports a concern under this policy, files a formal complaint, participates in an investigation, appears as a witness, serves as a support person, or exercises any right under this policy is subjected to retaliation for that participation. Retaliation is independently actionable as a serious violation of this policy and is subject to sanctions appropriate to its severity, independent of the outcome of the underlying complaint.

Retaliation may be direct, an adverse academic or employment action following a complaint, or subtle social exclusion, changes in workload, additional scrutiny, or other treatment that a reasonable person would understand as adversarial. Both forms are prohibited. Any person who experiences or witnesses retaliation reports it to the EOO immediately. The EOO investigates retaliation complaints with the same urgency and rigor as primary complaints. GOV-003 (Whistleblower Protection Policy) provides additional protections for persons who report institutional misconduct.

 AMERICAN INTERNATIONAL UNIVERSITY الجامعة الأمريكية الدولية	Policy Main Title	Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	Effective Date	14/06/2026
	Category	Institutional Governance / Compliance	Last Review date	
	Policy Number	ADM-003	Next Review date	14/06/2029
	Responsible Entity	Office of President	Approved By	President

Article 10: Prevention, Training, and Awareness

This policy's long-term effectiveness depends on building a campus culture in which the values it expresses are genuinely held, not merely complied with. The following prevention and training requirements apply:

- a. All new students complete an equal opportunity and non-discrimination orientation module during their first semester. The module covers this policy's key provisions, what conduct is prohibited, how to report, and what support is available. Completion is verified by the Vice President for Student Affairs.
- b. All new employees complete an equal opportunity and non-discrimination training Program before beginning work at AIU. Continuing employees complete refresher training every two years. Completion is tracked by HR and reported to the EOO.
- c. Persons in supervisory or managerial roles, Deans, Department Chairs, Directors, and HR staff, complete enhanced training on their mandatory reporting obligations, on identifying prohibited conduct in their areas, and on supporting persons who raise concerns, every two years.
- d. The EOO coordinates an annual equal opportunity awareness campaign on campus, using communications, events, and resources appropriate to the AIU student and employee community.
- e. The EOO prepares an annual report for the President and Board summarizing: the number of complaints received; their nature and category; the outcomes; the timelines achieved; any patterns identified; and the training activities conducted. This report is used to evaluate whether the policy and the training Program are effectively preventing prohibited conduct.
- f. Prevention strategies are reviewed annually in light of complaint patterns, community feedback, and developments in Kuwait higher education practice. Where prevention Programs are not working, as evidenced by complaint volumes, community surveys, or external review, they are revised accordingly.

Article 11: Relationship to Kuwait Law

This policy operates within the legal framework of the State of Kuwait. Several categories of conduct prohibited by this policy may also constitute criminal offences under Kuwait law, including harassment, indecent conduct, assault, and cybercrime. AIU's institutional disciplinary process is separate from and independent of any criminal proceedings:

- a. The institution may proceed with an investigation and determination under this policy regardless of whether criminal proceedings have been initiated, are pending, or have concluded.
- b. The outcome of criminal proceedings, whether conviction, acquittal, or no charge, does not automatically determine the outcome of the institutional process. The institutional process applies the balance of probabilities standard; criminal proceedings apply the beyond-reasonable-doubt standard. A person acquitted of a criminal charge may still be found to have violated this policy.

 AMERICAN INTERNATIONAL UNIVERSITY الجامعة الأمريكية الدولية	Policy Main Title	Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	Effective Date	14/06/2026
	Category	Institutional Governance / Compliance	Last Review date	
	Policy Number	ADM-003	Next Review date	14/06/2029
	Responsible Entity	Office of President	Approved By	President

- c. AIU does not obstruct or discourage any person from reporting conduct to Kuwait law enforcement or pursuing criminal proceedings. Where a person asks the University for assistance in understanding their options under Kuwait law, the EOO refers them to the University's Legal Counsel for information.
- d. Where the conduct disclosed to AIU appears to constitute a serious criminal offence under Kuwait law, particularly sexual assault, the EOO notifies the President and the University's Legal Counsel immediately. The decision on whether to make a report to law enforcement in such cases takes into account Kuwait law, the complainant's wishes, and the University's duty to protect its community.

Article 12: Records

The EOO maintains a complete official record for every complaint filed under this policy: the complaint, all investigation documentation, the determination, any appeal documentation, and records of sanctions implemented. Complaint records are retained for 10 years from the date of final resolution. Complaint records are available for: Accreditation agency review; internal institutional audit; Board governance review; and legal compliance purposes. Individual complaint records are not disclosed to third parties without the complainant's consent except where required by applicable law.

The EOO maintains a de-identified complaint register, a statistical record of all complaints, their nature, and their outcomes, without identifying information, that is reviewed annually and used for Program improvement and institutional effectiveness reporting.

Procedures

Reporting and Initial Response

1. A person who experiences or witnesses conduct prohibited by this policy contacts the EOO, the Vice President for Student Affairs (for student matters), or the HR Director (for employee matters) by email, phone, or in person. No special form is required at this stage, the initial contact may be by any means.
2. The Vice President for Student Affairs or HR Director who receives an initial contact provides immediate support and information, explains the options available under this policy, and informs the EOO of the contact within 1 working day. The EOO contacts the person within 2 working days to discuss next steps.
3. Where the initial contact or report indicates an immediate safety risk, the EOO implements interim measures within 2 working days without waiting for a formal complaint. The EOO notifies the President where the risk is serious.

 AMERICAN INTERNATIONAL UNIVERSITY الجامعة الأمريكية الدولية	Policy Main Title	Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	Effective Date	14/06/2026
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Formal Complaint Processing and Investigation

1. The complainant submits a written formal complaint to the EOO. The EOO date-stamps the complaint, acknowledges receipt within 3 working days, and notifies the respondent within the same period with a copy of the complaint and a request for a written response within 10 working days.
2. The EOO reviews the complaint and confirms whether it falls within the scope of this policy. Where it does not, the EOO notifies the complainant within 5 working days with the reason and, where applicable, a referral to the correct policy or process.
3. Where the complaint is within scope, the EOO commences the investigation within 5 working days of receiving the respondent's response. The EOO documents all investigative steps and ensures both parties are kept informed of progress without disclosing the other party's evidence prematurely.
4. The investigation report is completed within 30 working days of the investigation's commencement. The EOO provides both parties with a copy of the factual findings in the report, not the recommendations, for correction of any factual inaccuracy, giving each 5 working days to respond.
5. The EOO finalizes the investigation report and issues the written determination to both parties within 10 working days of closing the correction period.

Annual Equal Opportunity Report

1. By 15 October each year, the EOO compiles the annual equal opportunity report covering the preceding academic year: all complaints received; their category and nature; the outcomes; the timelines; any sanctions imposed; training completion rates by staff and student category; and the EOO's assessment of the effectiveness of the current prevention Program.
2. The EOO presents the report to the President by 31 October. The President presents a summary to the Board Academic Affairs Committee at its December meeting. Material findings, including patterns suggesting systemic problems, are escalated to the President immediately rather than waiting for the annual report cycle.
3. The EOO uses the annual report findings to revise training content, communication strategies, and prevention Program priorities for the following year. Proposed changes to the policy itself are submitted to the VPAA for the ACA-001 policy development process.

President Signature

Signature: _____ Date: _____