

Code of Conduct

(All Officers, Employees and Agents Having Responsibilities to all Loans Made, Insured or Guaranteed Under Title IV, HEA Program Loans or Private Loans)

I acknowledge as part of my responsibilities as an Officer, Employee and/or Agent having any responsibilities regarding any kind of loan, insured or guaranteed Under Title IV, HEA Program Loans or any Private Loans, that **I am strictly prohibited and banned from engaging in the following conduct or arrangements:**

- Any and all revenue-sharing arrangements with any lender;
- Receiving any gifts, gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a de minimus amount to you or family members from a lender, a guarantor, or a loan servicer. Gifts includes but not limited to, services, transportation, lodging, or meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred;
- Any consulting or other contracting arrangements with a lender or affiliate. This includes but not limited to accepting from any lender or affiliate of any lender any fee, payment, or other financial benefit (including the opportunity to purchase stock) as compensation for any type of consulting arrangement or other contract to provide services to a lender or on behalf of a lender relating to FFEL Program loans or private education loans;
- Directing borrowers to particular lenders or refusing or delaying loan certifications of, any loan based on the borrower's selection of a particular lender or guaranty agency;
- Requesting or accepting any offers of funds for private loans from any lender to be used for private education loans, including funds for an opportunity pool loan, to students in exchange for the institution providing concessions or promises regarding providing the lender with;
 - (A) A specified number of FFEL Program loans or private education loans;
 - (B) A specified loan volume of such loans; or
 - (C) A preferred lender arrangement for such loans;

- **Receives compensation for serving on any advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, except that the employee may be reimbursed for reasonable expenses, as that term is defined in § 668.16(d)(2)(ii), incurred in serving on such advisory board, commission, or group.**

Violations of the terms of the Code of Conduct rules, will subject you to various sanctions and punishments, that may include immediate dismissal of your employment or contract and/or referral to the appropriate authorities.