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### FINANCIAL AID CODE OF CONDUCT

The purpose of this policy is to prohibit conflicts of interest in situations involving student financial aid and to establish standards of conduct for employees with responsibility for student financial aid. As a participant in the federal student aid programs, and more specifically the student loan programs, United Beauty College is required to develop, publish, administer, and enforce a code of conduct that complies with the Higher Education Opportunity Act of 2008. The obligations set out in this policy do not modify or supersede requirements previously set forth by other State and Federal law.

#### INFLUENCING STUDENT LOANS

It is strictly prohibited for any Financial Service Staff or anyone in a position of influence over a student loan, to consult or contract with lenders for a financial benefit.

### **GIFTS**

It is prohibited for all employees to receive any gift from a lender, guarantor, or servicer of education loans. A gift to a family member of an employee or to any other individual based on that individual's relationship with the employee shall be considered a gift to the employee if the gift is given with the knowledge and acquiescence of the employee "The College".

### **LOANS**

The "The College" will not request or accept from any lender any offer of funds to be used for private education loans (as defined in the Federal Truth in Lending Act).

### REVENUE-SHARING ARRANGEMENT

The "The College" will not enter into any revenue-sharing arrangement with any lender whether for institutional or personal gain.

# **STAFFING ASSISTANCE**

The "The College" will not request or accept from any lender any assistance with call center staffing or financial aid office staffing. However "The College" may accept the following assistance from a lender related to:

- (i) Professional development training for "The College" staff
- (ii) Providing educational counseling materials, financial literacy materials, or debt management materials to borrowers, provided that such materials disclose to borrowers the identification of any lender that assisted in preparing or providing such materials
- (iii) Staffing services on a short-term, non-recurring basis to assist the "The College" with financial aid-related functions during emergencies, including State-declared or federally declared natural disasters, federally declared national disasters, and other localized disasters and emergencies identified by the Secretary of Education.

# **CONTRACTING ARRANGEMENTS**

No employee shall accept 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 education loans.

# **ADVISORY BOARD COMPENSATION**

No employee who serves on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors may receive anything of value from the lender, guarantor, or group of lenders or guarantors in return for that service. The employee may be reimbursed for reasonable expenses incurred in serving on such boards, commissions or groups.

Violations of this Policy may result in disciplinary action, up to and including dismissal.