

FINANCIAL AID CODE OF CONDUCT

The Higher Education Opportunity Act (HEOA) requires educational institutions to develop and comply with a code of conduct that prohibits conflicts of interest for financial aid personnel [HEOA s 487 (a)(25)].

Any employee associated with the financial aid department who has responsibilities with respect to student educational loans must adhere to this code of conduct policy.

1. Kelley Education Inc. employees are prohibited from entering into any revenue-sharing arrangements with a lender. A revenue-sharing arrangement means an arrangement between the school and a lender in which the lender provides or issues loans to students attending a school owned by Kelley Education or to their families.
2. Kelley Education Inc. employees will not recommend lenders or the loan products of the lender in exchange for benefits from the lender, including gifts, revenue or profit sharing, to Kelley Education Inc. schools.
3. Kelley Education Inc. shall not refuse to certify, or delay certification of, any loan based on the borrower's selection of a particular lender or guaranty agency.
4. Kelley Education Inc. shall not request or accept from any lender any offer or funds or be used for private education loans to students in exchange for the institution providing concessions or promises regarding providing the lender with: a) a specified number of private education loans (non-Title IV loans) or loans made, insured, or guaranteed under Title IV; b) a specified loan volume of such loans; or c) a preferred lender arrangement for such loans.
5. Kelley Education Inc. shall not request or accept lender assistance with call center staffing or staffing the institutions financial aid office.
6. Any person who is employed in the financial aid office at Kelley Education Inc., or who otherwise has responsibilities with respect to education loans and/or student financial aid, shall be prohibited from receiving anything of value from the lender or guarantor. If an employee serves on an advisory board, commission, or group of lenders or guarantors, the employee may be reimbursed for reasonable expenses.