



## Educational Private Loan Code of Conduct

1. No action will be taken by any employee of International Education Corporation that is for their personal benefit or could be perceived to be a conflict of interest.
  - a. Employees within the financial aid office will not award aid, including any private loan needed, to themselves or their immediate family members. Staff will reserve this task to an institutionally designated person, to avoid the appearance of a conflict of interest.
  - b. A preferred lender list is provided and it is compiled without prejudice and for the sole benefit of the students attending the institution. The information included about lenders and loan terms will be transparent, complete, and accurate. The complete process through which preferred lenders are selected is fully and publically disclosed. Borrowers will not be auto-assigned to any particular lender.
  - c. A borrower's choice of a lender will not be denied, impeded, or unnecessarily delayed by the institution, even if that lender is not included on the institution's preferred lender list.
  - d. No amount of cash, gift, or benefit in excess of a de minimis amount shall be accepted by an employee of International Education Corporation from any financial aid applicant (or his/her family), or from any entity doing business with or seeking to do business with the institution (including service on advisory committees or boards beyond reimbursement for reasonable expenses directly associated with such service).
2. Information provided to the borrower (or his/her family) by the financial aid office will be accurate, unbiased, and will not reflect preference arising from actual or potential personal gain.
3. All required consumer information is displayed in a prominent location on the institutional web site(s) and in any printed materials, easily identified and found, and labeled as "Consumer Information."
4. Any employee of International Education Corporation will disclose to their institution any involvement, interest in, or potential conflict of interest with any entity with which the institution has a business relationship.
5. Any employee of International Education Corporation who has responsibilities with respect to education loans or other student financial aid, and who serves on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, shall be prohibited from receiving anything of value from the lender, guarantor, or group of lenders or guarantors, except that the employee may be reimbursed for reasonable expenses incurred in serving on such advisory board, commission, or group.