

## University Code of Conduct

The Higher Education Opportunity Act of 2008 (HEOA) requires that institutions participating in the federal student loan programs develop, publish and enforce a code of conduct with respect to students loans.

Guilford College is committed to the highest standard of ethics and conduct and therefore, the staff of the Financial Aid office is bound by the institution's Code of Conduct and Ethics for Business Activities, which requires each individual to comply with legal and regulatory requirements, policies and procedures that apply to his or her particular duties. Additionally, to comply with the HEOA we have adopted the following Code of Conduct which applies to the officers, employees, agents of Guilford College.

The institution and its employees are banned from any revenue sharing arrangements with lenders.

No employees of financial aid offices and those employees who have responsibilities with respect to education loans shall solicit or accept any gift from a lender, guarantor, or servicer of education loans.

Gifts are defined as any gratuity, favor, discount, entertainment, hospitality, loan or other item having a monetary value of more than a de minimum amount, consistent with Guilford College's Conflict of Interest Policy, and includes a gift of services, transportation, lodging, or meals, whether in kind, by purchase of a ticket, payment in advance or reimbursement. Gifts do not include: standard material activities or programs related to a loan, default aversion/prevention, or financial literacy (e.g. workshops, training); food, refreshments, training or informational material furnished to an employee of an institution as an integral part of a training session designed to improve the service of a lender, guarantor or servicer of educational loans to the institution, if the training contributes to the professional development of the employee; loan benefits to a student employee if they are comparable to those provided to all students at the institution; entrance and exit counseling services provided to borrowers to meet the requirements of the HEA provided that the institution retains control of the counseling and the counseling is not used to promote the lenders products; philanthropic contributions to the institution by the lender.

Employees of the College's financial aid offices and those employees who have responsibilities with respect to education loans shall not accept from a lender or affiliate or any lender any fee, payment, or other financial benefit 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.

Guilford College will not for any first-time borrower, assign through award packaging or other methods, a borrower's private loans to a particular lender; or refuse to certify, or delay certification of, any loans based on the borrower's selection of a particular lender or guaranty agency.

The University shall not request or accept from any lender any offer of funds for private loans, including funds for an opportunity pool loan, to students in exchange for providing concessions or promises to the lender for a specific number of federal loans made, insured, or guaranteed, a specified loan volume, or a preferred lender arrangement.

Guilford College shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing (there are exceptions such as professional development training, providing counseling materials-debt management materials, etc. provided that the lender is disclosed on the materials; short term nonrecurring assistance during emergencies).

Employees of the college's financial aid offices and those employees who have responsibilities with respect to education loans and who serve 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 lender or guarantors, except that the employee may be reimbursed from reasonable expenses incurred in serving on such advisory board, commission, or group.