



Code of Conduct for Education Loans

This policy is applicable to Advanced Training Institute (ATI) officers, employees, and agents, and prohibits a conflict of interest with carrying out their responsibilities with regard to administering student loans and Federal financial aid programs. This policy is part of ATI's commitment to the highest ethical standards and conduct by its employees. It supplements the Code of Conduct stated in the Employee Handbook and it applies specifically to conduct related to student financial aid matters.

Financial Aid Code of Conduct

ATI expects the highest levels of professionalism and ethical behavior from all officers, employees, agents and consultants whose responsibilities include student financial aid matters. These individuals must avoid the potential for, or appearance/perception of any conflict of interest regarding their student financial aid responsibilities. They must refrain from taking any action they believe is contrary to law, regulation, or the best interest of the students they are serving, and must disclose all conflicts identified in this policy.

Code Principles and Standards

All officers, employees, agents, consultants and representatives of ATI involved in the administration of Federal Financial Aid shall read, understand, and adhere to the principles and standards contained in this policy. Applying common sense, good judgment, and integrity to every student financial aid matter will help ensure that decisions made are consistent with ATI's core values and this Financial Aid code of Conduct policy.

All directors, employees, agents, consultants, and representatives of ATI involved in the administration of Federal Financial Aid **shall not**:

- Receive anything of value from any lender in exchange for any advantage sought by the lender in making educational loans available to prospective or enrolled students of ATI.
- Enter into any revenue-sharing arrangement with any lender under which ATI recommends a lender or its products in exchange for a fee or other material benefits from the lender.
- Use federal funds received under federal financial aid programs to hire a registered lobbyist or pay any person or entity for securing an earmark to any legislation. ATI will not use such funds to pay any person for influencing or attempting to influence an officer or employee of any Agency, Member of Congress, officer or employee of Congress, or employee of a Member of Congress in connection with the awarding of any federal contract, making of any federal grant or loan, entering into any federal cooperative agreement, or the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement.



- Solicit or accept any gift from a lender, guarantor, or servicer of educational loans for any item or service having more than a nominal monetary value, other than standard materials (brochures, training aids) related to topics such as default prevention or financial literacy. Upon prior approval of the Chief Executive Officer, exceptions may be made for reasonable expenses for professional development that will improve the efficiency and effectiveness of ATI's financial aid programs.
- Accept from a lender or its affiliate any fee, payment, payment or other financial benefits as compensation for any type of consulting arrangement or other contract to provide services to a lender relating to educational loans.
- Request or accept from any lender any assistance with call center staffing or financial aid office staffing.
- Receive anything of value from a lender, guarantor, or group of lenders or guarantors if the employee serves on an advisory board, commission, or group established by a lender or group of lenders. An employee may be reimbursed for reasonable expenses incurred in serving on such advisory board, commission, or group.

In addition, all directors, employees, agents, consultants, and representatives of ATI involved in the administration of Federal Financial Aid **shall**:

- Refrain from taking any action for his/her personal benefit.
- Refrain from taking action s/he believes in contrary to law, regulation, or the best interest of the students and parents s/he serves.
- Ensure that the information s/he provides is accurate, unbiased, and does not reflect any preference arising from actual or potential gain.
- Be objective in making decisions and advising his/her institution regarding relationships with any entity involved in any aspect of student financial aid.