

Franklin University Switzerland Code of Conduct

The Higher Education Opportunity Act (HEOA) requires institutions participating in federal student loan programs to develop, publish, and enforce a code of conduct concerning student loans. Franklin University Switzerland executes the highest standard of ethics and behavior, and therefore, the staff of the Office of Financial Aid is bound by the institution's Code of Conduct below:

- 1. Franklin University Switzerland and its employees are banned from any revenue-sharing arrangements with lenders.
- 2. No employees of financial aid offices and those who have responsibilities concerning education loans shall solicit or accept any gift from a lender, guarantor, or servicer of education loans.
- 3. Employees in the financial aid office and those employees who have responsibilities with respect to education loans shall not accept from a lender, guarantor, or loan servicer any fee, payment, or other financial benefit as compensation for any consulting arrangement or other contract to provide services to a lender or on behalf of a lender relating to education loans.
- 4. Franklin University Switzerland will not assign any first-time borrower, through award packaging or other methods, to borrow from a particular lender or refuse to certify or delay the certification of any loans based on the borrower's selection of a specific lender or guarantor.
- 5. Franklin University Switzerland shall not request or accept any offer of funds for private loans to students in exchange for providing the lender with a specific number or volume of federal loans made, insured, or guaranteed, or a preferred lender arrangement.
- 6. Franklin University Switzerland shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing.
- 7. Employees of the financial aid office 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.