

## Kaplan Higher Education Code of Conduct for Student Loans

Kaplan Higher Education:

- Does not require students or parents to use particular lenders, or in any way limit the choice of lenders.
- Processes loan applications through any lender a student or parent chooses.
- Does not solicit or accept anything of value from any lender in exchange for any advantage sought by the lender to make federal or private student loans to students enrolled at, or admitted to, a Kaplan Higher Education school or their parents.
- Prohibits employees of the financial aid office, or any employee who otherwise has responsibilities with respect to educational loans, from accepting any gift worth more than \$10 from a lender.
- Prohibits employees of the financial aid office, or any employee who otherwise has responsibilities with respect to educational loans, from entering into any type of consulting arrangement or other contract with a lender to provide services relating to educational loans.
- Prohibits employees, representatives, or agents of lenders from providing staffing services to the financial aid office.
- Prohibits employees, representatives, or agents of lenders from identifying themselves to students of Kaplan Higher Education schools or their parents as employees, representatives, or agents of the financial aid office.
- Requires employees of the financial aid office or any employee who otherwise has responsibilities with respect to education loans to obtain permission from Kaplan Higher Education before agreeing to serve on a lender's advisory board and before being reimbursed for any expense for service on a lender's advisory board.
- Does not accept opportunity loans or funds for private loans from lenders in exchange for any advantage sought by the lender to make federal student loans to students of Kaplan Higher Education schools or their parents.
- Does not assign for any first-time borrower a loan to a particular lender, and does not refuse to certify or delay certification of any loan based on the borrower's selection of a particular lender or guaranty agency.