

## JOHNSON COLLEGE STUDENT LENDING CODE OF CONDUCT

Johnson College is committed to providing students and their families with the best information and processing alternatives available regarding student borrowing. In support of this and in an effort to rule out any perceived or actual conflict of interest between Johnson College officers, employees or agents and education loan lenders, Johnson College has adopted the following:

- Johnson College does not participate in any revenue-sharing arrangements with any lender.
- Johnson College does not permit any officer, employee or agent of the school who is employed in the financial aid office or is otherwise involved in the administration of education loans to accept any gifts of greater than a nominal value from any lender, guarantor or servicer.
- Johnson College does not permit any officer, employee or agent of the school who is employed in the financial aid office or is otherwise involved in the administration of education loans to accept any fee, payment or other financial benefit (including a stock purchase option) from a lender or affiliate of a lender as compensation for any type of consulting arrangement or contract to provide services to a lender or on behalf of a lender relating to education loans.
- Johnson College does not permit any officer, employee or agent of the school who is employed in the financial aid office or is otherwise involved in the administration of education loans to accept any thing of value from a lender, guarantor, or group of lenders and /or guarantors in exchange for service on an advisory board, commission or other group established by such a lender, guarantor, group of lenders and/or guarantors. Johnson College does allow for the reasonable reimbursement of expenses associated with participation in such boards, commissions or groups by lenders, guarantors, or groups of lenders and/or guarantors.
- Johnson College does not assign a lender to any first-time borrower through financial aid packaging or any other means.
- Johnson College recognizes that a borrower has the right to choose any lender from which to borrow to finance his/her education. Johnson College will not refuse to certify or otherwise deny or delay certification of a loan based on the borrower's selection of a lender and/or guarantor.
- Johnson College will not request or accept any offer of funds to be used for private education loans to students from any lender in exchange for providing the lender with a specified number or volume of Title IV loans, or a preferred lender arrangement for Title IV loans.
- Johnson College will not request or accept any assistance with call center or financial aid staffing.