

## CODE OF CONDUCT

In order to ensure that ATSU maintains the highest ethical standards, each staff member at ATSU who has loan-related responsibilities will **not**:

- Enter into revenue-sharing arrangements with lenders.
- Accept gifts of more than nominal value from lenders, guarantors and loan servicers.\*
- Receive compensation for consulting services to lenders.
- Assign lenders to any borrowers.
- Refuse to certify a loan based on the borrower's choice of lender.
- Participate in opportunity pools with lenders.
- Permit lender staff to assume school call center or financial aid office staff functions.
- Receive compensation for private loans.
- Serve as advisory board members for compensation, except for reasonable expenses incurred as a result of that service, such as travel expenses.

*\* The following items are not considered "gifts" for this purpose:*

- Brochures, workshops or training related to loans, default prevention or financial literacy.
- Food, refreshments, training or informational material furnished as part of a financial aid professional training session.
- Borrower benefits provided by the lender to all students at the institution.
- Entrance and exit counseling, as long as the school controls the counseling, and "such counseling does not promote the products or services of any specific lender" (GEN-08-12, p. 70).
- Philanthropic contributions that are not made in exchange for loan volume.