CODE OF CONDUCT FOR EDUCATIONAL LOANS

Title IV Aid – School Code of Conduct Policy

The Aveda Institute strives to educate, counsel, and provide financial resources to all students so that they may achieve their higher-learning goals to be prepared for careers in the fields of cosmetology, esthiology and nail esthetics.

In compliance with the federal law, AICH officers, employees, and agents shall maintain exemplary standards of professional conduct in all aspects of carrying out his or her responsibilities, including all dealings with any entities involved in any manner in student financial aid, regardless of whether such entities are involved in a government sponsored, subsidized, or regulated activity.

Any Aveda Institute officers, employees and agents shall refrain from:

- 1.Entering into any revenue-sharing arrangements with any lender.
- 2.Soliciting or accepting any gift from a lender, guarantor, or servicer of education loans. For purposes of this prohibition, the term "gift" means any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a de minimus amount.
- 3.Accepting from any lender or affiliate of any lender any fee, payment, or other financial benefit (including the opportunity to purchase stock) as compensation for any type of consulting arrangement or other contract to provide services to a lender or on behalf of a lender relating to education loans.
- 4.Assigning, through award packaging or other methods, the borrower's loan to a particular lender; or refuse to certify, or delay certification of, any loan based on the borrower's selection of a particular lender or guaranty agency.
- 5.Requesting or accepting from any lender any offer of funds to be used for private education loans, including funds for an opportunity pool loan, to students in exchange for the institution providing concessions or promises regarding providing the lender with specified number of loans, volume, or a preferred lender arrangement for such loans.
- 6.Requesting or accepting from any lender any assistance with call center staffing or financial aid office staffing.
- 7.Receiving anything of value from the lender, guarantor, or group of lenders or guarantors for any employee who is employed in the financial aid office, or

who otherwise has responsibilities with respect to education loans or other student financial aid, and who serves on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, except that the employee may be reimbursed for reasonable expenses incurred in serving on such advisory board, commission, or group.

Any Aveda Institute officers, employees or agents pledges to diligently:

- 1.Help students seek, obtain, and make the best use of all financial resources available and provide services that do not discriminate on the basis of race, religion, color, financial status, sex, ethnic origin, age, veteran status or sexual orientation.
- 2.Respect and protect the confidentiality the students records and of the economic circumstances of the student and student's family. Information will be released only on the written consent of the student and/or student's family, and all policies and procedures shall protect the student's right of privacy.

Commit to the highest level of ethical behavior and refrain from conflict of interest or the perception thereof.