

## Code of Conduct

Artistic Academy recognizes that ensuring the integrity of the student financial aid process is critical to providing fair and affordable access to higher education. It is with this belief Artistic Academy has formalized the following guidelines that shall be effective immediately. These guidelines are designed to avoid any potential conflict of interest between Artistic Academy, its students or their parents in the student financial aid process. Accordingly, Artistic Academy shall take all reasonable steps to adhere to the following principles in the Schools financial aid operations:

1. All Artistic Academy employees should receive no personal benefit. No officer, trustee or employee of Artistic Academy shall accept anything of more than nominal value on his or her behalf or on behalf of another person or entity from any Lending Institution. For example, cash, stocks, gifts, entertainment, expense-paid trips, etc. should never be accepted from a Lending Institution. Likewise, an individual should never receive payment or reimbursement from a Lending Institution for lodging, meals or travel to conferences or training seminars. However, an officer, trustee or employee of Artistic Academy may:

- (a) conduct non-school business with any Lending Institution and, subject to state law, receive value in connection with such non-school business, so long as such value is not intended to influence the officer, trustee or employee in conducting School business;
- (b) conduct School business and, subject to state law, receive value on behalf of Artistic Academy that is unrelated to the student loan activities of the Lending Institution;
- (c) attend conferences and meetings of tax-exempt organizations that are funded or sponsored by more than one entity and, subject to state law, receive materials, refreshments, and other things of like value provided at such professional conferences and meetings; and,
- (d) hold membership in, serve on the board of or participate in the activities of any tax-exempt organization and, subject to state law, receive travel reimbursements and other things of like value from the tax-exempt organization for such activities.

2. Artistic Academy employees should not serve on lender advisory boards for remuneration. No officer, trustee or employee of Artistic Academy who makes financial aid decisions for Artistic Academy or who is employed in, supervises or otherwise has responsibility or authority over Artistic Academy's financial aid office shall receive any remuneration for serving as a member or participant of an student loan advisory board of a Lending Institution or any reimbursement of expenses for such service. Any officer, trustee or employee of Artistic Academy who serves as a member or participant of a Lending Institution board shall recuses himself or herself from any board discussions regarding Artistic Academy's financial aid operations.

3. Artistic Academy should not provide any advantage to a Lending Institution. Artistic Academy shall not accept anything of value from any Lending Institution in exchange for any advantage or consideration provided to the Lending Institution related to its student loan activities, including but not limited to revenue-sharing, printing costs or below-cost computer hardware or software. Likewise, Artistic Academy shall not allow any Lending Institution to:

- (a) staff Artistic Academy financial aid office at any time; or
- (b) communicate with Artistic Academy's students or their parents in such a manner as to create the impression that the Lending Institution is an employee or agent of Artistic Academy in connection with Artistic Academy's student financial aid operations, including through the use

of mascots, logos, etc. Finally, Artistic Academy shall not enter into any agreement with a Lending Institution to provide alternative (i.e., non-federal or "opportunity") student loan programs if the provision of such alternative loan programs prejudices other students or parents.

4. Artistic Academy should make appropriate use of any Preferred Lender Lists. If Artistic Academy decides to promulgate a list or lists of preferred or recommended lenders for student loans or similar ranking or designation ("Preferred Lender List"), the selection of Lending Institutions for inclusion on the Preferred Lender List shall be based on the best interests of Artistic Academy.