

## FINANCIAL AID CODE OF CONDUCT POLICY

The Higher Education Opportunity Act (HEOA) requires educational institutions to develop and comply with a code of conduct that prohibits conflicts of interest for financial aid personnel [HEOA s 487 (a)(25)].

Any employee associated with the financial aid department at Pivot Point Academy who has responsibilities with respect to student educational loans must adhere to this code of conduct policy.

1. Pivot Point Academy financial services associates or employees are prohibited from entering into any revenue-sharing arrangements with a lender. A revenue-sharing arrangement means an arrangement between the school and a lender in which the lender provides or issues loans to students attending Pivot Point Academy or to their families.
2. Pivot Point Academy financial services associates or employees will not recommend lenders or the loan products of the lender in exchange for benefits from the lender, including gifts, revenue or profit sharing, to Pivot Point Academies.
3. Pivot Point Academy shall not refuse to certify, or delay certification of, any loan based on the borrower's selection of a particular lender or guaranty agency.
4. Pivot Point Academy shall not request or accept from any lender any offer or funds or be used for private education loans to students in exchange for the institution providing concessions or promises regarding providing the lender with: a) a specified number of private education loans (non-Title IV loans) or loans made, insured, or guaranteed under Title IV; b) a specified loan volume of such loans; or c) a preferred lender arrangement for such loans.
5. Pivot Point Academy shall not request or accept lender assistance with call center staffing or staffing the institutions financial aid office.
6. Any person who is employed in the financial aid office at Pivot Point Academy, or who otherwise has responsibilities with respect to education loans and/or student financial aid, shall be prohibited from receiving anything of value from the lender or guarantor. If an employee serves on an advisory board, commission, or group of lenders or guarantors, the employee may be reimbursed for reasonable expenses.