

On August 14, 2008 the Higher Education Opportunity Act (Public Law 110-315) (HEOA) was enacted. This legislation reauthorizes the Higher Education Act of 1965. Part of this legislation requires that Belmont Abbey College have and enforce a code of conduct for all of its officers, employees and agents of the institution.

Belmont Abbey College does not recommend or attempt to influence student's right to choose their own lender if they elect to take out a private educational loan. The college will not refuse certification of an alternative loan based on the borrower's lender selection or guaranty agency. Students have the right to choose their lender and will not be assigned a lender by the college.

**The following Code of Conduct applies to all employees, officers and agents of Belmont Abbey College who have responsibilities with respect to student educational loans. All of these individuals must comply with the following policy:**

**Ban on revenue-sharing arrangement with any lender:** Employees, officers and agents of Belmont Abbey College shall not enter into any revenue-sharing arrangement with any lender.

**Ban on receiving gifts from any lender, guaranty agency or loan servicer:** Employees, officers and agents of Belmont Abbey College shall not solicit or accept any gift in the form of a gratuity, favor, discount, entertainment, hospitality, loan service, transportation, lodging, meals, reimbursement, or other item having a monetary value of more than a de minimus amount. Gifts do not include standard material activities, default prevention or financial literacy (workshops, training).

**Ban on contracting arrangements:** Employees, officers and agents of Belmont Abbey College shall not accept from any lender or affiliate of any lender any fee, payment or other financial benefit (including stock purchasing options) 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.

**Prohibition on offers of funds for private loans:** Belmont Abbey College shall not request or accept from any lender an offer of funds for private loans, including funds for an opportunity pool loan, to students in exchange for providing concessions or promises to the lender for a specific number of loans made, insured or guaranteed, a specific loan volume, or a preferred lender arrangement. An "opportunity pool loan" is defined as a private education loan made by a lender to a student that involves a payment by the institution to the lender for extending credit to the student.

**Ban on staffing assistance.** Belmont Abbey College shall not request or accept any lender assistance with financial aid office staffing.

**Ban on advisory board compensations:** No member of the financial aid office staff of Belmont Abbey College, or any other employee that has responsibilities with respect to education loans or any other student financial aid shall derive any material benefit from serving on an advisory board, commission or group established by a lender, guarantor, or group of lenders or

guarantors. However, such individuals may be reimbursed for reasonable expenses incurred in serving on such advisory board, commission or group.