

## **Student Loan Code of Conduct**

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To comply with the Higher Education Act Sec. 153(c)(3), 487(a)(25), Focus Personal Training Institute (FPTI) adopts the following Student Loan Code of Conduct to serve as the guiding principles in ensuring the integrity of the financial aid processes. All FPTI employees who have responsibilities with respect to educational loans are required to comply with this Student Loan Code of Conduct.

1. Neither FPTI as an institution nor any individual employee shall enter into any revenue-sharing arrangements with any lender. For the purposes of this document, revenue-sharing is defined to mean any arrangement between an institution and a lender making Title IV loans wherein the institution recommends the lender or the loan products, and in exchange, the lender pays a fee or provides a service to the institution or its employees.
2. An employee who has responsibilities with respect to education loans, or any of their family members, shall not solicit or accept 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. The term includes a gift of services, transportation, lodging or meals, whether provided in-kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.
3. An employee who has responsibilities with respect to education loans shall not accept 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. FPTI shall not, through award packaging or other methods, assign a first-time 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. FPTI shall not request or accept from any lender any offer of funds to be used for private education loans, including funds for an opportunity pool loan, in exchange for the institution providing concessions or promises to a lender regarding a specified number of loans made, insured, or guaranteed; a specified volume of loans; or a preferred lender arrangement for such loans. An opportunity pool is defined as a private education loan made by a lender to a student (or the student's family) that involves payment by the institution to the lender for extending credit to the student.
6. FPTI shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing unless those services are short-term and nonrecurring, in the event of an emergency or disaster or for office staff professional development. Those services may include providing counseling, financial literacy, or debt management materials to borrowers as long as such materials disclose to borrowers the name of the lender that provided or assisted in the preparation of the materials.
7. Any employee who 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, shall be prohibited from receiving anything of value from the 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.