

Shear Finesse Hairstyling Academy

Institutional Code of Conduct for Education Loans

A. Statement of Commitment

Shear Finesse Hairstyling Academy does not currently recommend specific lenders, nor does it participate in any preferred lender arrangements. However, in keeping with the school's core value, which includes the institution's commitment to professionalism, ethics, and integrity, Shear Finesse Hairstyling Academy recognizes that it must carry out its role in the student financial aid process according to high standards of professionalism and ethics. To ensure the integrity of the student financial aid process, Shear Finesse Hairstyling Academy has established this Institutional Code of Conduct for Educational Loans and will take all reasonable steps to adhere to the guidelines set forth below.

B. Specific Obligations

The following list has been developed to detail certain practices not permitted by Shear Finesse Hairstyling Academy in the administration of financial aid under Title IV.

1. Shear Finesse Hairstyling Academy will Not Enter into Any Revenue Sharing Arrangement with Any Lender

Shear Finesse Hairstyling Academy does not have, nor will it enter any agreement with any lender that provides or issues loans that are made, insured, or guaranteed pursuant to federal student aid programs established under Title IV of the Higher Education Act of 1965, as amended ("Lender"), in which the lender pays a fee or provides other material benefits, including revenue or profit sharing to the school, or an officer, employee, or agent of the school.

2. Shear Finesse Hairstyling Academy Personnel Will Not Accept Improper Benefits

- a.** No Shear Finesse Hairstyling Academy officer, employee, or agent who is employed at Shear Finesse Hairstyling Academy or who otherwise has responsibilities with respect to financial aid will solicit or accept any gift or other material benefit having a monetary value from a Lender. A gift or material benefit means any gratuity, favor, discount, entertainment, hospitality, loan, service, transportation, lodging, or meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.
- b.** A gift or material benefit does not include any of the following items or services listed below. But while the above items do not legally constitute a

gift or material benefit, these matters should be reported to the school Compliance Officer or Director of Shear Finesse Hairstyling Academy to determine if a conflict of interest is present.

- Standard material, activities, or programs on issues related to a loan, default aversion, default prevention, or financial literacy, such as a brochure, a workshop, or training.
- Food, refreshments, training, or informational material furnished to a Shear Finesse Hairstyling Academy officer or employee, or to an agent of the school, as an integral part of a training session that is designed to improve the service of a lender, guarantor, or servicer of education loans to the institution, if such training contributes to the professional development of the officer, employee, or agent.
- Favorable terms, conditions, and borrower benefits on an education loan provided to a student employed by Shear Finesse Hairstyling Academy if such terms, conditions, or benefits are comparable to those provided to all students at the Shear Finesse Hairstyling Academy.
- Entrance and exit counseling services provided to students, as long as—
 - a) the school’s staff are in control of the counseling (whether in person or via electronic capabilities); and
 - b) such counseling does not promote the products or services of any specific lender.
- Philanthropic contributions to Shear Finesse Hairstyling Academy from a lender, servicer, or guarantor of education loans that are unrelated to education loans or any contribution from any lender, guarantor, or servicer that is not made in exchange for any advantage related to education loans.

c. With the advance approval of Shear Finesse Hairstyling Academy officers: employees, or agents may:

- conduct non-school-related business with any Lender and, subject to state law, receive value in connection with such non-school-related business, provided that such value is not intended to influence the officer, employee, or agent with regard to the student loan activities of the Lender at the Shear Finesse Hairstyling Academy;
- conduct Shear Finesse Hairstyling Academy business with any Lender and, subject to state law, receive value on behalf of Shear Finesse Hairstyling Academy that is not related to the student loan activities of the Lender;

- 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
- 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 value from such tax-exempt organization for such activities.

No family member of an officer, employee or agent of Shear Finesse Hairstyling Academy who has responsibilities with respect to financial aid may solicit or accept any gift or material benefit from a Lender if (1) the gift is given with the knowledge and acquiescence of the officer, employee, or agent; and (2) the officer, employee, or agent has reason to believe the gift was given because of the position held by the officer, employee, or agent.

3. Shear Finesse Hairstyling Academy Personnel Will Not Enter into Improper Contractual Relationships with Lenders

No officer, employee, or agent, or agent of Shear Finesse Hairstyling Academy who has responsibilities with respect to financial aid will accept any compensation from any Lender or any Lender’s affiliate for any type of consulting arrangement or other contract to provide services on behalf of the Lender. Such compensation includes fees, cash payments, or other

4. Shear Finesse Hairstyling Academy Will Not Improperly Steer Borrowers to a Lender

The school will not assign a first-time borrower’s loan to a particular Lender, through award packaging or other methods. The school will not refuse to certify or unreasonably delay certification of any loan based on the borrower’s selection of a particular Lender or guaranty agency. This section does not preclude Shear Finesse Hairstyling Academy from requiring all borrowers to use the Federal Direct Loan program.

5. Shear Finesse Hairstyling Academy Will Not Enter Into Improper Contractual Relationships with Lenders

Shear Finesse Hairstyling Academy does not and will not request or accept funds from a Lender that are intended to be used for Private Educational Loans (i.e., non-Title IV loans) for students in exchange for the Shear Finesse Hairstyling Academy’s promise to refer student applications for Title IV loans to the Lender, or for the promise that such referrals be for a certain specified

Title IV loan volume, or for the promise that such referrals be made pursuant to a preferred lender arrangement.

6. Shear Finesse Hairstyling Academy Will Not Accept Improper Staffing Assistance

Shear Finesse Hairstyling Academy does not and will not request or accept any assistance with call center staffing or financial aid office staffing from a Lender, except where permitted by law for professional development and training of financial aid administrators or on a short-term non-recurring basis during emergencies, including State-declared or federally declared disasters, or with the permission of the Secretary of United States Department of Education. Shear Finesse Hairstyling Academy may provide certain materials to borrowers, including educational counseling materials, financial literacy materials, or debt management materials, which were produced by Lenders, provided that such materials clearly identify the Lender that assisted in preparing or providing such materials.

7. Shear Finesse Hairstyling Academy Personnel Will Not Be Compensated for Service on Lender Advisory Boards

No Shear Finesse Hairstyling Academy officer, employee, or agent who has responsibilities with respect to financial aid will receive anything of value for serving as a member or participant of an advisory board, commission, or group established by a Lender, guarantor of a Lender, or a group of lenders or guarantors. However, with advance approval of the Director, Shear Finesse Hairstyling Academy personnel may receive reimbursement for reasonable expenses incurred in serving on such advisory board, commission, or group.

8. Shear Finesse Hairstyling Academy Will Use Preferred Lender Lists Properly

Shear Finesse Hairstyling Academy does not currently recommend specific lenders. If the school decides in the future to publish a list or lists of preferred or recommended Lenders for student loans ("Preferred Lender List"), Shear Finesse Hairstyling Academy will prepare the Preferred Lender List according to the best interests of the school's students and parents, without regard to the Shear Finesse Hairstyling Academy's financial interests.

Questions on this Institutional Code of Conduct for Educational Loans can be directed to Shear Finesse Hairstyling Academy's Offices of Admissions and/or Financial Aid at 904-764-6474 .

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