

**WIDENER UNIVERSITY STUDENT FINANCIAL AID
CODE OF CONDUCT**

Widener University (“University”) hereby adopts this Code of Conduct (“Code”) relating to its financial aid and educational loan practices:

I. Prohibition of Certain Remuneration to University Employees

1. Officers, trustees, directors, employees, or agents of the University are prohibited from accepting anything of more than nominal value on his or her own behalf or on behalf of another from or on behalf of a Lending Institution, except that this provision shall not be construed to prohibit any officer, trustee, director, employee, or agent of the University from conducting non-University business with any Lending Institution. As used in the preceding sentence and throughout this Code, a Lending Institution is defined as:

- (a) Any entity that itself or through an affiliate engages in the business of making loans to students, parents or others for purposes of financing higher education expenses or that securitizes such loans; or
- (b) Any entity, or association of entities, that guarantees education loans.

2. Nothing in this Code shall prevent the University from holding membership in any nonprofit professional association. The University shall continue to have personnel representing the University on current and successor state agency boards as they may be created to promote the University’s interest in all current and future state grant programs as benefit the University’s students. These boards do not have a primary function of providing the University or any board member representation in determining any lender(s) or guarantor(s) loan programs for student borrowers.

3. The prohibition set forth in the subparagraph 1 above shall include, but not be limited to, a ban on any payment or reimbursement by a Lending Institution (not including state

agency boards and/or similar governmental or non-profit entities) to a University employee for lodging, meals, or travel to conferences or training seminars.

II. Limitations on University Employees Participating on Lender Advisory Boards

The University shall prohibit any officer, trustee, director, employee, or agent of the University from receiving any remuneration for serving as a member or participant of an advisory board of a Lending Institution, or receiving any reimbursement of expenses for so serving, provided, however, that participation on advisory boards that are unrelated in any way to higher education loans shall not be prohibited by the Agreement.

III. Prohibition of Certain Remuneration to the University

The University may not accept on its own behalf anything of value from any Lending Institution in exchange for any advantage or consideration provided to the Lending Institution related to its education loan activity. This prohibition shall include, but not be limited to, (i) “revenue sharing” by a Lending Institution with the University, (ii) the University’s receipt from any Lending Institution of any computer hardware for which the University pays below-market prices and (iii) printing costs or services. Notwithstanding anything else in this paragraph, the University may accept assistance as contemplated in 34 CFR 682.200(b)(definition of “Lender”)(5)(i) and nothing contained herein shall prohibit or restrict the University’s “School as Lender” programs or any successor or affiliated loan programs which are permitted by law.

IV. Alternative Loan Preferred Lender Lists

In the event that the University promulgates a list of preferred or recommended lenders or similar ranking or designation (“Preferred Lender List”) with respect to alternative loans, then

- (a) Every brochure, web page or other document that sets forth a Preferred Lender List must clearly disclose the process by which the University selected lenders for said Preferred Lender List, including but not limited to

the criteria used in compiling said list and the relative importance of those criteria.

- (b) Every brochure, web page or other document that sets forth a Preferred Lender List or identifies any lender as being on said Preferred Lender List shall state in the same font and same manner as the predominant text on the document that students and their parents have the right and ability to select the education loan provider of their choice, are not limited to or required to use any of the lenders on said Preferred Lender List, and will suffer no penalty from the University for choosing a lender that is not on said Preferred Lender List. In addition, each such brochure, web page or other document that sets forth a Preferred Lender List shall include a statement that the University is required to process, and shall not delay the processing of, the documents required to obtain a loan from any eligible lender the student or parents select.
- (c) The University's decision to include a Lending Institution on any such list and the University's decision as to where on the list the Lending Institution's name appears shall be determined solely by consideration of the best interests of the students or parents who may use said list without regard to the pecuniary interests of the University.
- (d) The constitution of any Preferred Lender List shall be reviewed no less than annually.
- (e) No Lending Institution shall be placed on any Preferred Lender List unless the said lender provides assurance to the University and to student and

parent borrowers who take out loans from said Lending Institution that the advertised benefits upon repayment will continue to inure to the benefit of student and parent borrowers regardless of whether the Lending Institution's loans are sold.

- (f) No Lending Institution of which the University is expressly aware that has an agreement to sell its loans to another unaffiliated Lending Institution shall be included on any Preferred Lender List unless such agreement is disclosed therein in the same font and same manner as the predominant text on the document in which the Preferred Lender List appears.
- (g) No Lending Institution shall be placed on any one of the University's Preferred Lender Lists or in favored placement on any one of the University's Preferred Lender Lists for a particular type of loan, in exchange for benefits provided to the University or to the University's students in connection with a different type of loan.
- (h) Every Preferred Lender List shall include at least three unrelated Lending Institutions, and for any affiliated lenders on the list, the University shall disclose the specifics of such affiliation.
- (i) The University may provide a list of allowable and prohibited practices and services that Lending Institutions may provide.
- (j) The University shall not allow any Lending Institution to use the name or any symbol or logo of the University in marketing any loan in any way that implicates that the University endorses the loans offered by the Lending Institution.

- (k) The University shall prohibit the use of the logo of any Lending Institution on the University's financial aid materials.

V. Prohibition of Lending Institutions' Staffing of University Financial Aid Offices

The University shall prohibit employees or other agents of a Lending Institution from being identified to students or prospective students of the University or their parents as an employee or agent of the University. No employee or other agent of a Lending Institution may staff the University financial aid offices at any time.

VI. Prohibition of Opportunity Loans

The University shall not arrange with a Lending Institution to provide any "Opportunity Loans." The term "Opportunity Loans" shall mean agreements which provide that the Lender will make loans up to a specified aggregate amount to students with poor or no credit history, or international students who the Lender claims would otherwise not be eligible for the Lender's alternative loan program.

VII. Conflict of Interest

This Code shall prohibit a conflict of interest or the appearance of a conflict of interest with the responsibilities of any University officer, employee or agent with respect to student loans or other financial aid.

VIII. Training

The University shall require all of its officers, employees and agents with responsibilities with respect to student loans or other financial aid annually to obtain training, and/or to acknowledge compliance, with this Code.

This Code of Conduct is adopted effective May 17, 2007, and may be amended, revised, altered or revoked by the University at any time.