

*This Code of Conduct is provided by Baldwin Wallace University to its employees who work in the Office of Financial Aid.*

## **Code of Conduct Baldwin Wallace University**

### **INTRODUCTION**

Baldwin Wallace University values the integrity of our institution and its people. The position you hold within Baldwin Wallace University is evidence of the trust we have in our faculty and staff. Compliance with the spirit as well as the letter of all applicable laws, regulations, and Baldwin Wallace University policies, and performance of our duties according to the highest standards of honesty and integrity is expected of all of us.

This Code of Conduct applies to all officers and staff in the financial aid office and all officers and staff, directors or trustees who have any duties with respect to education loans (“Covered Employees”). If you violate any of the policies set forth in this Code of Conduct, you subject yourself to discipline, up to and including termination of your employment. Moreover, if you violate provisions of the Code of Conduct you also subject Baldwin Wallace University to possible sanctions or liability. If you do not understand any provisions of the Code of Conduct or have any related questions you should always feel free to call on any of the resources listed in the section below titled Places for Assistance. If you observe violations or potential violations of this Code of Conduct you should also contact Baldwin Wallace University Human Resources Department as listed in the Places for Assistance section.

### **CODE OF CONDUCT PROVISIONS**

A Covered Employee of Baldwin Wallace University (the “School”) acting in his or her role as a student financial aid professional will:

1. Refrain from taking any action he or she believes is contrary to law, regulation, or the best interests of the students and parents he or she serves.
2. Ensure to the best of the employee’s ability that the information he or she provides to students and parents is accurate, unbiased, and does not reflect any preference arising from actual or potential personal gain.
3. Disclose to the School any financial interest in or similar involvement with any non-School entity involved in any aspect of student financial aid at the School.
4. Be objective in advising the School regarding relationships with any entity involved in any aspect of the School’s student financial aid administration.
5. Disclose to the School any instance of a lending institution attempting to give a gift to you, or any family member or relative of yours, or any other individual who has a close relationship with you. For purposes of this section, “gift” means any gratuity, favor, discount, service, entertainment, hospitality, loan, transportation, lodging, or meals, or other item that has monetary value.
6. Except as described in this section, refrain from soliciting or accepting anything of value (including any gift as described above), whether provided in kind, by purchase of a ticket, payment in advance or reimbursement after the expense has been incurred, from any person or business involved in the education loan business, including lenders, servicers or guarantors. This prohibition on accepting gifts also applies to your family members, or any other person based on that person’s relationship with you,

if the gift is given with your knowledge and you have reason to believe that the gift was given because of your official position with the School. Notwithstanding the above, you may accept reimbursement of reasonable expenses related to service on an advisory body established by a lender or guarantor or a group of lenders and guarantors, and you may accept food, refreshments, training or informational material that are an important part of a training session that is designed to improve the service of a lender, guarantor or servicer of education loans to the School, if such training contributes to your professional development, all as approved in writing by the School's Human Resources Department.

## **PLACES TO GO FOR ASSISTANCE**

If you have a question regarding any policy contained in this Code of Conduct or you are aware of any actual or potential breach, you should contact Baldwin Wallace University Human Resources Department. To the maximum extent possible, the School will protect the confidentiality of persons who report possible breaches of this Code of Conduct on the part of other persons.