

International Air and Hospitality Academy complies with The Higher Education Opportunity Act (HEOA) to develop a code of conduct that prohibits conflicts of interest for financial aid personnel [HEOA § 487(a)(25)]. All of International Air and Hospitality Academy's staff members who have responsibilities towards student educational loans comply with this code of conduct.

- No employee of International Air and Hospitality Academy employed in the financial aid office or who has responsibilities of educational loans, or family members shall solicit or accept any gift from a lender, guarantor or servicer of educational loans.

- International Air and Hospitality Academy individual employees or as an institution shall not enter into any revenue-sharing arrangements with any lender.

- International Air and Hospitality Academy employees shall not assign borrowers to any particular lender or refuse to certify a loan for a lender based on the borrower's selection of a particular lender or guaranty agency.

- Any person employed by International Air and Hospitality Academy in the financial aid office or other person having responsibilities with respect to education loans will 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.

- International Air and Hospitality Academy shall not request or accept from any lender any offer of funds to be used for private education loans to students in exchange for the institution providing promises regarding providing the lender with a preferred lender arrangement for such loans, a specified loan volume of such loans or a specified number of loans made, insured, or guaranteed under Title IV;

- All International Air and Hospitality Academy employees in the financial aid office, or persons who has responsibilities towards 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.

- International Air and Hospitality Academy shall not accept or request any lender's assistance with call center staffing or financial aid office staffing.

- Any and all reimbursement received for any service on advisory boards, commissions or other groups by lenders, servicers or guarantors must be reported annually to the Department of Education by International Air and Hospitality Academy.