

## CLC CODE OF CONDUCT

College Loan Corporation was founded with the belief that integrity and ethical business practices would be the cornerstone of our success.

In 1999, CLC was established to help make a difference in the lives of families who needed help paying for college. From our inception, CLC has offered more than educational loans. We go the extra mile to provide families with one-on-one multilingual counseling and the 24/7 advice that empowers them to make the best choices for their unique financial situation. Our hard work helping families finance a college education in an ethical environment won us the coveted 2006 Torch Award for Marketplace Ethics from the San Diego Better Business Bureau for demonstrating ethical business practices in the marketplace.

As part of our continued efforts to lead the industry in providing ethical, first-class service, we take great pride in presenting the CLC Code of Conduct. Our Code of Conduct, as with all of our business practices, showcases the vision that we have had since our inception: to provide ethical advice to students and families to help them achieve their higher education dreams.

1. CLC employees will never seek to influence the decision of student and parent borrowers of institutions of higher education regarding choice of education lender based on considerations other than the quality of its products and services.
2. CLC has not, and will not, provide payment of any kind, whether in the form of cash, stock or other remuneration, to any employee of an institution of higher education's financial aid office.
3. CLC has not, and will not, engage in revenue sharing agreements with institutions of higher education.
4. CLC has not, and will not, participate in "opportunity loan pools."
5. CLC has not, and will not, participate in any school-as-lender relationships with any institutions of higher education.
6. CLC employees, including those staffing CLC call centers, have not and will not state or imply that they are employees, representatives or agents of an institution of higher education.

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**Lender Code 833733**

7. CLC employees will not provide staffing assistance to the financial aid office of an institution of higher education.
8. CLC will never give anything of value to any officer, trustee, director, employee or agent of any institution of higher education, including the payment or reimbursement of expenses, except that CLC may give items of nominal value that are offered as a form of generalized marketing or advertising, or to create good will.
9. CLC has not, and will not, provide an institution of higher education anything of value in exchange for any advantage or consideration provided to CLC related to CLC's higher education loan activity.
10. CLC Advisory Boards have been, and shall be, comprised of representatives from institutions of higher education both where CLC appears on the institution's Preferred Lender List and where it does not.
11. CLC has not, and will not, compensate CLC Advisory Board members for their service on the Board. CLC Advisory Board members shall receive nothing of value, including reimbursement of expenses, associated with their service on the Board or their participation in Board meetings.
12. CLC will provide training or related informational material to employees of institutions of higher education only where such training contributes to the professional development of the institutions' employees.
13. CLC will continue to provide assistance to schools that is comparable to the kinds of assistance provided to a school by the Secretary of Education under the Direct Loan program and as otherwise authorized by Department of Education regulations and guidelines.
14. CLC will, upon request, disclose to any requesting institution of higher education the range of rates CLC charges to students at the institution, the number of borrowers at each rate at the school, and CLC's historic default rate at the institution.

15. CLC will, upon request, disclose to any requesting institution of higher education the qualification rate and “on track rate” of any CLC offered borrower benefits that require borrower action.
16. CLC will provide general debt counseling and training to students of institutions of higher education, on behalf of institutions, only where CLC materials and employees are clearly identified as being associated with CLC and without promoting or marketing its loan products in the course of such counseling or training.
17. CLC will clearly inform potential borrowers, prior to applying for a private student loan, to consider less expensive financing options available to them including federal financial aid.
18. CLC will disclose to potential borrowers any agreement between CLC and an unaffiliated entity to sell CLC loans, if the sale would result in a change of servicer for such loans.
19. CLC has always, and will continue to, honor borrower benefits on its loans, regardless of whether the loan is sold to another entity or the servicer is changed.
20. CLC does not, and will not, enter into “affinity” relationships with school alumni associations, in which such associations are paid anything of value in exchange for loan referrals.