William D. Ford Direct Loan Program
Code of Conduct

Background
Institutions accredited to administer the United States (US) Federal Aid (Direct Loan) Program ('Program') are required to comply with US laws and regulations relating to that Program.

This Code of Conduct is a requirement of the US Department of Education for accredited institutions under the US Higher Education Opportunity Act 2008, and applies to the officers, employees and agents of the University of Melbourne who are involved with the administration of the Program in any way.

Code of Conduct
In all communications, interactions and transactions with lenders, guarantee agencies, and loan servicers, officers, employers and agents of the University of Melbourne must ensure that their conduct stands up to scrutiny against the following ethical measures:
- Transparency: full disclosure to students of the reasons for any advice given or action taken; in instances of ambiguity policy should be promulgated and referenced.
- Even handedness/lack of bias: no student is to receive treatment that evidences favouritism or penalty.
- Freedom from influence: representatives of the University must give impartial advice and remain free from influence (whether real or perceived) by a third party such as lender, guarantor or loan servicer.

Officers, employees and agents of the University of Melbourne are not permitted to engage in the following activities in accordance with this Code of Conduct:
- Enter into an arrangement to, or otherwise, receive any fee, revenue, gift or benefit (either personally or on the University’s behalf) for recommending a student borrower to a particular lender, or for recommending a particular loan product to a student.
- Directing borrowers to a particular lender, exert influence in relation to lender choice, or to delay, or refuse to certify a loan based on the borrower’s lender/guarantor choice.
- Solicit or accept any gift from a lender, guarantor, or servicer of education loans (either personally or on the University’s behalf), including any gratuity, favour, discount, entertainment, hospitality, loan, or other item of any value.
- Request or accept from any lender any offer of funds for private loans in exchange for incentives or concessions from the University regarding loan arrangements.
- Enter into an arrangement to provide consulting or other services for a lender in return for a fee, payment or other financial benefit.
- Outsource Program advisory responsibilities to a lender, or request a lender to provide assistance with the University’s Program administration.
- Receive payment for serving on an industry advisory board (or similar) established by lender/guarantor/consortium other than recovery of reasonable expenses.

Use of Loan resources produced by Lenders, Guarantors, or Loan Servicers are permitted as long as they are clearly identified, have no reciprocal requirements, are factually neutral, and no perception of impropriety or undue influence arises as a consequence.

Relevant documents
- US Amended Higher Education Act 1965
- US Higher Education Opportunities Act 2008 [HEA Sec. 487(a)(25)]
- The University of Melbourne FFELP Programme Participation Agreement
- US Federal Regulations Title 34, 668 (Student Assistance General Regulations) and 682 (Federal Family Education Loan (FFEL) Programme)

References
http://ifap.ed.gov/ForeignSchoolInfo/ForeignSchoolInfo.html

Approval
Mr Robert Westerink
Manager, Scholarships & Bursaries
University Services

<table>
<thead>
<tr>
<th>Version</th>
<th>Approved By</th>
<th>Approval Date</th>
<th>Effective Date</th>
<th>Sections Modified</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Mr Wayne Betts</td>
<td>September 2013</td>
<td>September 2013</td>
<td>Nil</td>
</tr>
<tr>
<td>2</td>
<td>Mr Robert Westerink</td>
<td>March 2016</td>
<td>March 2016</td>
<td></td>
</tr>
</tbody>
</table>