



Financial Aid Code of Conduct

Purpose

The Higher Education Opportunity Act (HEOA), Section 487(a)(25), requires educational institutions participating in federal student financial aid programs to establish and comply with a code of conduct that prohibits conflicts of interest for financial aid personnel.

Valynn Beauty Academy is committed to ensuring that the interests of our students remain the highest priority in all financial aid decisions and activities. This Code of Conduct establishes standards of ethical behavior and prohibits practices that could create actual, potential, or perceived conflicts of interest in the administration of student financial assistance.

All officers, employees, representatives, and agents of Valynn Beauty Academy who have responsibilities relating to student financial aid or educational loans are required to comply with this Code of Conduct.

1. Compliance with Applicable Laws and Regulations

Valynn Beauty Academy is committed to complying with all applicable federal, state, and local laws and regulations governing the administration of financial aid and educational loans.

This includes, but is not limited to, the Higher Education Act, regulations and guidance issued by the United States Department of Education, requirements established by the school's accrediting agency, and applicable Utah state laws and regulations.

If any provision of this Code conflicts with applicable law or regulation, the applicable legal requirement shall govern.

2. Prohibition on Gifts and Compensation

No officer, employee, representative, or agent of Valynn Beauty Academy who has responsibilities relating to student financial aid or educational loans may solicit or accept gifts from any lender, loan servicer, guarantor, or affiliate of a lender.

This prohibition also applies to gifts provided to family members or other individuals when there is reason to believe the gift was knowingly provided because of the employee's or representative's official position or responsibilities.

For purposes of this policy, a gift includes any gratuity, favor, discount, entertainment, hospitality, loan, service, or other item having monetary value. Gifts of any amount are prohibited when covered by applicable federal requirements.

3. Lender Advisory Board Restrictions

No officer, employee, representative, or agent of Valynn Beauty Academy with responsibilities relating to student financial aid or educational loans may accept compensation or reimbursement of expenses for serving on or participating in a lender's advisory board, commission, committee, or other group established by a lender, guarantor, or group of lenders or guarantors.

Reasonable reimbursement of expenses directly incurred in connection with participation may be accepted only when expressly permitted by applicable federal law and regulations.

4. Prohibition on Conflicting Financial Relationships

No officer, employee, or agent of Valynn Beauty Academy who has responsibilities relating to student financial aid or educational loans may accept from a lender or lender affiliate any fee, payment, financial benefit, or other compensation in exchange for consulting services, contractual arrangements, or other services relating to educational loans.

This prohibition includes compensation or benefits such as opportunities to purchase stock or other financial interests offered because of the individual's financial aid responsibilities.

Representatives or employees of lenders may not misrepresent themselves as employees, officers, or authorized representatives of Valynn Beauty Academy when communicating with students or their families.

5. Timely Certification of Student Loans

Valynn Beauty Academy shall not:

- Assign a first-time borrower's educational loan to a particular lender through financial aid packaging, recommendations, or any other method.
- Refuse to certify or delay certification of an otherwise eligible educational loan based on a student's selection of a particular lender or guaranty agency.

All loan certifications shall be processed in accordance with applicable federal requirements and established institutional procedures.

6. Prohibition on Revenue Sharing

Valynn Beauty Academy shall not enter into revenue-sharing arrangements with any student loan lender.

Revenue sharing includes any arrangement in which a lender provides or issues educational loans to students or their families and, in exchange for the institution recommending the lender

or its loan products, provides a fee, payment, revenue share, profit share, or other material benefit to the institution or its employees, representatives, or agents.

Financial aid recommendations and student lending information shall be provided without financial incentives or arrangements that compromise the interests of students.

7. Prohibition on Opportunity Loan Arrangements

Valynn Beauty Academy shall not request or accept funds, offers, or other benefits from a lender in exchange for providing concessions or promises relating to private educational loans or federal student loans.

Prohibited arrangements include agreements involving:

- A specified number of educational loans originated or provided to students.
- A specified dollar volume of educational loans.
- A preferred lender arrangement in exchange for financial or other institutional benefits.

An opportunity loan generally refers to a private educational loan offered to borrowers with limited or poor credit histories, or to borrowers who otherwise may not meet a lender's standard eligibility requirements.

8. Prohibition on Lender Staffing Assistance

Valynn Beauty Academy shall not request or accept staffing assistance from any lender for its financial aid office, call center, or other financial aid operations.

This includes assistance with in-person student services, financial aid counseling, and required initial or exit counseling, except where such assistance is expressly permitted under applicable federal student aid requirements.

9. Implementation, Training, and Annual Review

Valynn Beauty Academy shall ensure that all employees with direct responsibilities relating to student financial aid or educational loans receive appropriate training regarding this Code of Conduct, applicable federal and state laws and regulations, and institutional financial aid policies and procedures.

Training shall be completed within 30 days of the adoption of this Code of Conduct or, for newly hired employees, within 30 days of the employee's hire date.

The Academy shall review this Code of Conduct with applicable employees at least annually and within 30 days of the effective date of any new requirements that materially affect their responsibilities.

The Academy shall also review this policy and related procedures as part of its ongoing institutional compliance activities to ensure continued adherence to applicable financial aid requirements.

All employees are expected to promptly report suspected violations, conflicts of interest, or conduct inconsistent with this Code of Conduct.

10. Questions, Concerns, and Reporting

Students, employees, and other members of the Valynn Beauty Academy community who have questions or concerns regarding compliance with this Code of Conduct are encouraged to contact the Academy's administration or designated Financial Aid Administrator.

Concerns may be submitted directly to:

Valynn Beauty Academy

Attn: School Administration / Financial Aid Administrator

Website: <https://valynnacademy.com>

All concerns will be reviewed in accordance with applicable institutional policies and legal requirements.

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