It is the policy of Saint Peter's University to administer its student loan program in a manner which provides the maximum benefit to its student borrowers. In conformance with this policy and in order to avoid even the appearance of impropriety, neither the University nor any employee of the University, will solicit or accept any benefit from a student lending institution as consideration for any advantage provided to the lending institution in relation to its educational loan activities. The following principles and prohibitions apply to the student loan program at Saint Peter's University:

- 1. The University shall not engage in any revenue sharing arrangement with any student lending institution.
- 2. No employee of the University shall accept on his or her behalf, anything of value from a student lending institution.
- 3. No employee of the University shall serve as a member or participant of a board of a student lending institution, unless the participation in unrelated in any manner to educational loans or the employee has no direct involvement with, or benefits from, the functions of the University financial aid office.
- 4. No employee, representative or agent of a student lending institution shall be authorized by the University to be identified to the public as an employee, representative or agent of the University.
- 5. No employee, representative or agent of a student lending institution shall provide staffing services to the University financial aid office.

The University shall not provide or otherwise disseminate or make available a preferred lender list that:

- 1. Is used to deny or otherwise impede a borrower's choice of lender
- 2. Contains the names of fewer than three student lending institutions
- 3. Includes student lending institutions that have offered a benefit to the University or its student borrowers in exchange for inclusion on the list, except for terms or conditions of an educational loan which are favorable to the borrower.

No preferred lender list shall be provided or otherwise disseminated unless it contains the following:

- 1. A disclosure in plain language of the process by which the University selects student lending institutions for the preferred lender list including the method and criteria utilized and the relative importance of each criteria.
- 2. A clear statement that the borrower has the right and ability to select the educational loan provider of the borrower's choice, is not required to use any of the lenders on the list, and will suffer no penalty or unnecessary delay for choosing a lender not on the preferred lender list.

Inclusion on the preferred lender list shall be determined solely by considering the best interests of the borrower. Any student lending institution placed on the list shall provide assurance to the University and to borrowers that the advertised benefits upon repayment will continue to inure to the benefit of the borrower regardless of whether the lending institution's loans are sold.

The list shall not include any student lending institution that to the University's knowledge after reasonable inquiry, has an agreement to sell its loans to another lending institution unless the existence of the agreement is clearly disclosed. Favorable placement on the list shall not be provided to any student lending institution for a particular type of loan in exchange for benefits provided to the University or its students in connection with a

different type of loan. The contents of any preferred lender list shall be reviewed and updated at least annually.

The University shall inform student borrowers and prospective borrowers of all financing options available under Title IV of the Higher Education Act of 1965 including information on terms and conditions of available loans under that Title IV or under State law that are more favorable to the borrower.

The University shall not direct in any manner, potential borrowers to electronic promissory notes or other loan agreements that do not provide a reasonable and convenient alternative for the borrower to complete such documents with any federal approved student lending institution offering the relevant loan in this State.