



**ALTA COLLEGES, INC.**

**CODE OF BUSINESS CONDUCT AND ETHICS**

**Revised February 21, 2012**



Dear Colleagues,

The education industry is one of the most heavily regulated industries in the country. Compliance with laws, regulations and our internal policies and procedures is critical for your personal success and to the overall success of Alta Colleges, Inc. and its operating divisions, Westwood College, Westwood College Online and Redstone College (collectively “Alta”).



Dean Gouin, Alta Colleges President and CEO

Every person who works at Alta is expected to understand the rules and adhere to the highest ethical standards and practices in everything they do, every day.

Alta is committed to complying with the rules and regulations that govern our industry, and we have a number of procedures and safeguards in place to ensure compliance. Most important is the Alta Colleges Code of Conduct, which specifies the ethical standards that all employees must follow as members of this institution of higher learning.

Learning and understanding the Code of Conduct is critical, but more importantly, you must follow the rules and make a personal commitment to hold yourself accountable to the highest ethical standards. We are asking you to be a positive force in our community. We will not waver from our commitment to operate, and to treat each other, as well as the students, communities, and others we serve, with honesty and integrity.

Please join me in making Alta Colleges a model for honesty and integrity in the educational community we serve. Thank you for following the Code in everything you do, and for all the things you do every day to support the success of our students.

All the best,

Dean Gouin  
President and CEO  
Alta Colleges

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**C**ommitted  
to the highest  
standards

## **OUR CULTURE AND THE CODE**

The Code applies to all officers, directors and employees of Alta Colleges, Inc. and its operating divisions, Westwood College, Westwood College Online and Redstone College (collectively “Alta”), and to anyone acting on behalf of Alta. We are committed to the highest standards of business ethics. Integrity and ethics are at the core of Alta’s culture. Doing what is right for the right reasons is fundamental to how we conduct ourselves in fulfilling our mission. We must treat employees, students, business partners, the communities in which we operate, and others with honesty and integrity while we pursue Alta’s mission.

Our commitment to the highest standards of business ethics requires that we conduct ourselves in accordance with all applicable laws and regulations. The Alta Colleges, Inc. Code of Business Conduct and Ethics (“Code”) helps each of us in this endeavor by providing a statement of the fundamental principles and key policies and procedures that govern the conduct of our business. Our business depends on the reputation of Alta and its employees for integrity and principled business conduct. Thus, in many instances, this Code may go beyond the requirements of the law.

The Code is a statement of policies for individual and business conduct and does not, in any way, constitute an employment contract or an assurance of continued employment. As Alta employees, we are employed at-will except when we are covered by an express, written employment agreement.

## **OUR SHARED COMMITMENT**

**W**e will  
conduct  
business with  
integrity

The Code states our shared commitment to employees, students, business partners, and others that we will conduct business with integrity and the highest standards of business ethics. Each of us is responsible for knowing and understanding the policies and guidelines contained in the following pages. If you have questions, ask them; if you have ethical concerns, raise them. Our conduct should reflect Alta’s culture and values, demonstrate ethical leadership, and promote a work environment that upholds Alta’s reputation for honesty and integrity, ethical conduct, and trust.

The Code is a resource – it should be used whenever questions about the legal or ethical propriety of business conduct arise on the job. The Code cannot cover every situation you might encounter, but it should help you think about the appropriateness of your behavior and the behavior of others. All employees, officers and directors of Alta are expected to read this Code and uphold its standards. Additionally, you have an obligation to take the necessary steps, as described below, to inform the appropriate people of any violations that you have knowledge of, whether it is within or outside your area of responsibility.

## **SUPERVISOR RESPONSIBILITY**

Alta supervisors must meet and model the highest standards of business ethics. Encouraging frank discussion of the ethical and legal implications of business decisions is an effective management technique. If you are a supervisor, you should ensure that every Alta employee you supervise understands and appreciates Alta's expectations, as expressed in the Code, and how the Code, Alta's policies, or the law apply to relevant business operations or issues that arise. Alta depends upon supervisors to take every opportunity to model behaviors that are consistent with this Code and Alta's other policies.

## **NON-EXCLUSIVE SCOPE**

The Code cannot cover explicitly every situation or circumstance that you may encounter. Many of the subjects and issues discussed in the Code are addressed in greater detail in other Alta materials, including Alta Employee Policies and Procedures, and the policies related to specific departments or functions. You must familiarize yourself with such policies and applicable laws, rules, and regulations.

If you believe that any provision of the Code conflicts with any Alta policy stated elsewhere, contact your supervisor or any other resources listed throughout this Code. Generally speaking, any such conflicts will be resolved in favor of the letter and spirit of the Code.

## **ETHICAL DECISION MAKING**

Alta recognizes that all employees will encounter ethical decisions in their work. Our Code is intended to help you to both recognize and resolve those decisions.

If you find yourself facing a business decision with ethical overtones, ask yourself:

- Is this legal?
- Could this harm Alta's reputation?
- Does this violate any Alta policy?
- What would my family or my friends say about this?
- How would this look in the newspaper?
- Would I bet my job on this?
- Should I check with my supervisor or an Alta executive about this?

If you are unsure about what to do or want to discuss any concerns related to this Code, you should contact your supervisor, Human Resources Department, Chief Legal Officer or the Employee Ethics Hotline via the Web ([www.MySafeWorkplace.com](http://www.MySafeWorkplace.com)) or by calling 1-800-461-9330.

**F**amiliarize  
yourself with the  
Code

Always remember that, in conducting Alta business, you must:

- Comply with the letter and spirit of all applicable laws, rules, and regulations;
- Comply with all Alta policies and procedures;
- Act with highest standards of business ethics;
- Inquire when in doubt about whether a course of action is appropriate;
- Report suspected or known violations of any applicable laws, rules, regulations, or Alta policies or procedures, including the Code;
- Certify your familiarity and compliance with the Code.

### **FAIR DEALING**

Alta depends on its reputation for honesty and integrity. The way we deal with our students, competitors, suppliers, and others molds our reputation, builds long-term trust and determines our success. You should endeavor to deal fairly with Alta's students, competitors, suppliers, and others. We must never take unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

### **CONFLICTS OF INTEREST**

All employees, directors and officers of Alta must avoid having a personal, business, financial or other interest, activity or relationship, outside Alta that has or may be in conflict with Alta or its students. Any material transaction or relationship that may undermine your commitment or influence your judgment, decisions or actions with respect to Alta's interest, must be disclosed to Alta's Chief Legal and Compliance Officer.

The following examples are some common situations that could result in a conflict of interest:

- Performing work or rendering direct consulting or managerial services for an organization that competes or does business with Alta without appropriate approval from management;
- Having a personal, business, social or romantic relationship with a student or prospective student;
- Directing business to a supplier based on the fact that the supplier is owned, managed by or employs a relative;
- Receiving a personal loan or guarantee of an obligation as a result of your position with Alta;
- Using or disclosing any confidential information gained during employment for an employee's personal benefit or the benefit of others, including a future employer.

- Having a spouse, partner or someone whom you have a close personal relationship with report to you. This includes supervising or being in a position to influence the hiring, duties, or evaluation of an employee that you have a close personal relationship. If this situation exists or develops, you must notify your supervisor immediately.

It is not possible to identify or list all situations in which a conflict of interest may exist. Alta relies on your integrity and good judgment to avoid situations that may create a conflict of interest or appear to create a conflict of interest.

### **RELATIONSHIPS WITH LENDERS**

Officers, employees and agents of Alta, in dealing with lenders providing financial aid to our students, must comply with the following Code of Conduct provisions:

- You must avoid creating any relationship with any lender that would constitute a conflict of interests, as defined in the Code;
- Neither you nor any member of your family can accept a “gift” from a lender, broadly defined to include any gratuity, favor, discount, entertainment, hospitality, loan or other item worth more than *de minimus* amount;
- You may not accept any compensation from any lender or affiliate of any lender for any reason;
- You may not establish any revenue sharing arrangement with any lender;
- You must provide students with a choice of lenders, which includes lenders Alta may designate as “preferred,” and you may not direct or assign students to a particular lender. You must also allow students to use the lender of their choice even if it is not on the list of choices you provide to the student;
- You may not request or accept any call center staffing or financial aid back office services from any lender;
- You may not request or accept private education loan funds in exchange for guaranteeing volume or number of loans or preferred lender arrangements to any lender; and,
- You may not accept anything of value, except for reasonable expense reimbursement, for service on an advisory board, commission, committee or group established by any lender or guarantor.

*Q: I am dating a co-worker who was promoted to supervisor of our team. Is this a problem?*

*A: Yes. The situation would create a conflict of interest in your group. Even if you and your colleague are currently equals in the same group, you should advise your manager of the relationship to prevent an inappropriate reporting relationship.*

## **CORPORATE OPPORTUNITIES**

You owe Alta a duty to advance its legitimate business interests while you are conducting the business of Alta. You should not take personal advantage of opportunities or favors offered to you as a result of your employment by or affiliation with Alta. By way of example, you should not accept a discount on personal purchases of a supplier's products or services unless the same discount is offered to all Alta employees. Similarly, you should not take for your own personal gain any opportunities that you learn about through the use of Alta's property or information, or through your position at Alta.

*Q: A vendor offers me tickets to a professional sporting event. Can I accept them?*

*A: Possibly. If the vendor is inviting you to attend the game with him/her, this could constitute a business activity that must meet the Code's standard. If the vendor is not attending, then the tickets would be considered a gift and must comply with our Code's standard for accepting gifts.*

## **OUTSIDE EMPLOYMENT AND ACTIVITIES**

You must not provide services to any entity that competes with Alta. Also, if you have other employment besides your work for Alta, be aware that a conflict of interest may arise if that other employment impairs your ability to perform your responsibilities for Alta in a timely and effective way. You must ensure that any non-Alta employment activities are kept entirely separate from your Alta employment. You must not work on non-Alta employment activities on Alta time, or use Alta personnel or other resources for such activities.

## **GIFTS, ENTERTAINMENT AND TRAVEL**

Gifts, travel and entertainment each may create a conflict of interest with your obligations to Alta. While gifts, travel, and entertainment can be part of building and maintaining business relationships, thereby furthering Alta's interests, these are areas in which difficult issues can arise. In order to avoid even the appearance of a conflict of interest, follow these guidelines:

- You may accept or offer business entertainment that is reasonable in cost, frequency, and nature; however, you must get prior approval from your supervisor before accepting entertainment of more than nominal value. Business entertainment includes such things as an occasional meal, a local cultural or sporting event, or entertainment at a company facility.
- You generally should not allow a contractor or supplier to Alta to pay for air travel or accommodation expenses relating to entertainment or industry events. If you believe that there is a legitimate Alta business purpose for you to attend such an event, you should consult your supervisor to seek approval to attend at Alta's expense.
- Never accept a gift, travel, entertainment, or favor if doing so would or could appear to compromise your judgment on an Alta business matter.
- When giving gifts, you must ensure that the gift is reasonable within the context of the business relationship and could not appear to be an attempt to influence or obligate the recipient in some way.

- Gifts of money or cash equivalents are never acceptable.
- Never solicit a gift, favor, travel, or entertainment, except in instances in which Alta authorizes support for a cause (for example, a charitable event).
- Bribes, kickbacks, payoffs, or any other unusual or improper payments made to obtain or keep business are unethical, illegal, and forbidden.
- Strict rules apply to gifts and entertainment extended to governmental officials. Refer to the more specific portions of the Code that deal with this topic for further guidance.

Again, it bears repeating that accepting or giving gifts, travel, or entertainment frequently can present difficult issues. As always, when in doubt, consult your supervisor or the Employee Ethics Hotline via the Web ([www.MySafeWorkplace.com](http://www.MySafeWorkplace.com)) or by calling 1-800-461-9330.

### **Dealings with Governmental Employees**

You must not give, offer, or promise an employee of a local, state, or federal governmental body, or a member of that employee’s immediate family, any gift, gratuity, favor, discount, entertainment, hospitality, service, transportation, lodging, meal, or any other item of monetary value.

Federal, state, and local laws on this subject are varied, can tend to be fluid in nature, and are frequently the focus of careful scrutiny by the media and by governmental officials tasked with ensuring compliance with their own rules. Thus, exceptions to the prohibition on providing anything of value to any governmental employee must be approved in advance by Alta’s Chief Legal and Compliance Officer.

### **CONFIDENTIALITY, PRIVACY AND INTELLECTUAL PROPERTY**

Alta’s employees must exercise care to avoid disclosing non-public, internal, secret, or proprietary information related to Alta or its students to unauthorized persons, either within or outside of our organization during employment or afterwards, except as such disclosure is legally mandated or approved by Alta.

Unauthorized use or distribution of proprietary or confidential information violates our policy. Such use or distribution could result in negative consequences for Alta and the individual(s) involved, including potential legal and disciplinary action.

*Q: My sister is a realtor. May I provide her with a list of employee and student names, email addresses and phone numbers to assist her in building her client base?*

*A: No. Providing this information to an unauthorized third party is prohibited.*

*Q: I am the registrar and a parent contacted me requesting a copy of their son's transcript, financial aid award letter and billing statement. Can I send this information to them?*

*A: Possibly. You cannot release any confidential information, unless the student has given the school prior written consent or the parent's information was used in determining the amount of Title IV aid that student was eligible to receive.*

“Proprietary and confidential information” includes all information and materials that are in possession or under the control of Alta that are considered to be confidential or proprietary by Alta or third party (i.e, students, consultants). This includes intellectual property, business plans, student records, personal employee information and unpublished financial information.

### **Confidentiality of Student Records**

Federal law, including the Family Educational Rights and Privacy Act of 1974 (“FERPA”), contains provisions designed to afford parents and students with privacy and other rights with respect to student educational records. Those provisions include limitations on which student records can be disclosed by institutions and to whom they can be disclosed without the prior consent of the student. The FERPA applies to the educational records of all of Alta’s current and former students. Thus, Alta will and must comply with all of these requirements, and you must know, understand, and follow them.

### **Employee Privacy**

While Alta respects the privacy and dignity of all individuals, you should have no expectation of privacy in information that you send, receive, access, or store on any Alta computer systems, telephone systems, or networks. Alta reserves the right, at any time, to access and view workplace communications (such as Internet activity, electronic mail, instant messaging or other messages, materials stored on computers, and voicemail), as well as to access and inspect your Alta-provided workspace.

You should not search for or retrieve items from another employee's workspace without prior approval of that employee or management. Similarly, you should not use communication or information systems to obtain access to information directed to or created by others without the prior approval of management, unless such access is part of your job function and responsibilities at Alta.

Personal items, messages, or information that you consider to be private should not be placed or kept in telephone systems, computer or electronic mail systems, office systems, offices, work spaces, desks, credenzas, or file cabinets. Alta reserves all rights, to the fullest extent permitted by law, to inspect such systems and areas and to retrieve information or property from them when deemed appropriate in the judgment of Alta management.

Alta collects and maintains personal information that relates to your employment, including medical and benefit information. Special care is taken to limit access to personal information to personnel with a need to know such information for a legitimate purpose. Employees who are responsible for maintaining personal information, and those who are provided access to such information, must maintain all proprietary and confidential information in strict confidence, except when such disclosure is required by law or has been authorized by Alta.

### **Competitive Information and Trade Secrets**

Alta's intellectual property is valuable, and Alta will take steps as necessary to protect it. Similarly, Alta respects the intellectual property rights of others. Laws concerning the protection of intellectual property, such as copyright laws, protect many materials you may use in your work for Alta. Also, patent laws protecting inventions, trademark laws protecting product and service names, and trade secret laws protecting proprietary information all must be respected. You must not infringe on the valid intellectual property rights of others.

In connection with your Alta employment, you must not reveal or encourage others to reveal, or use or encourage others to use, any trade secrets of Alta or others, such as your former employer or any competitor of Alta. Trade secrets may include such things as operational data, technical information, strategies, student lists, prospective student lists or pricing information.

### **Competition Laws**

The antitrust laws were developed to encourage competition among businesses and to protect consumers from anti-competitive conduct. Alta of course will comply fully with such laws. It is beyond the scope of the Code to explain the complexities of this important area of the law in any detail; you should contact Alta's Chief Legal and Compliance Officer if you have questions.

Following these guidelines will help you avoid running afoul of the antitrust laws:

- Never discuss pricing, terms of service, or any other competitive information with Alta competitors.
- Never divide markets or territories with Alta competitors.
- Never engage in bid-rigging.
- Never disparage a competitor.
- Never make a claim about Alta without a factual basis for the claim.
- Never boycott a supplier.
- Never discuss or agree with others to do any of the things prohibited above.

**A**lta's  
intellectual  
property is  
valuable

## **ACCURATE AND RELIABLE BOOKS AND RECORDS**

Alta relies on accurate and reliable records in making business decisions. Thus, you must prepare and maintain Alta records accurately and honestly. You are never authorized to make false, misleading, or artificial entries on Alta's books or other records. All transactions must be fully and completely documented, and no Alta funds may be used for any purposes other than as described in records that support payment. Of course, no Alta funds or assets may be maintained for any improper or illegal purpose.

### **Financial and Non-Financial Reporting**

Alta is obligated to make and keep books, records, and accounts that fairly and accurately reflect Alta transactions and to prepare financial reports and statements that are neither false nor misleading. Alta's financial reports and statements must present full, fair, accurate, timely, and understandable disclosure of the financial matters they contain. If you are responsible for any aspect of Alta's accounting controls or systems for financial or tax reporting, you must be vigilant about accurately and honestly making entries and meet all legal requirements relating to those matters. You are never authorized to take any action that would undermine or dilute the integrity of Alta's financial reports or statements. If you encounter a difficult issue or are uncertain about the propriety of how a transaction is recorded, or any other account or tax matter, bring those issues to the attention of your supervisor for discussion.

Alta employees must cooperate fully with internal and outside auditors during examination of Alta's books, records and operation.

### **Alta's Business Records and Communications**

Alta's records provide evidence of actions taken and decisions made, and thus are critically important to the operation of Alta's business. Records are information created by or received by Alta; they can be in any form of media and can be originals or copies.

Some Alta records are obvious or self-evident (for example, a contract or a memorandum or a financial statement), while others are less obvious (for example, messages left on Alta's voicemail systems or entries on a calendar in an Alta office). All business records of Alta are Alta's property, are considered confidential and must be retained in accordance with applicable records retention policies. Business records should not be taken or sent outside Alta or provided to any individual not employed by Alta unless to do so advances Alta's business interests and has been approved in advance. Alta business records should not be maintained on an employee's personal computer or similar device unless to do so advances Alta's business interests and has been approved in advance.

Business records and communications can be publicly disclosed through governmental investigations, litigation, or the media. You therefore should always strive to be clear, to the point, truthful, and accurate in all Alta business records and communications. Do not exaggerate, speculate, guess, or make derogatory comments in your business communications.

## **USE OF COMPANY RESOURCES**

### **Alta Assets**

You must protect Alta assets from loss, damage, misuse, and theft. This includes intangible assets, especially information. Information about Alta's business is a critical asset; Alta's success depends in part on keeping such information secure. Thus, you should treat all Alta business information as confidential unless it has been made public by Alta. You should not discuss confidential Alta matters in public places or on the Internet (whether in a chat room, a blog, or elsewhere).

### **Procurement**

Alta employees who are responsible for buying or leasing materials, services, and other assets for Alta's use must guard their objectivity in a conscious manner. Decisions in this area should be based on obtaining the best overall value for Alta. Typically, competitive bids should be obtained, quality and service claims by suppliers should be verified, and the financial and legal condition of suppliers should be examined. You should never make an agreement for Alta that provides for a payment that is unreasonable or inconsistent with the value of the goods or services that Alta is to receive.

All equipment and supplies purchased by Alta remains as Alta property, including but not limited to office supplies, office furniture, fax machines, computers, software, hardware, supplies and equipment, and may not be used by Alta employees for personal reasons.

### **Community Activities and Contributions**

Alta encourages your participation in community activities of your choice. If it ever becomes a question, you should make it clear that your actions and views are your own, not those of Alta. You also should ensure that community or other outside activities do not interfere with your job responsibilities at Alta. You should never allow another Alta employee to pressure you to contribute to any particular charitable organization, nor should you pressure a fellow Alta employee to do so. If you would like to use Alta time or property or other Alta resources in support of charitable, non-political activity, you must obtain the prior approval of your supervisor before doing so.

## **Political Contributions and Activity/Lobbying**

You should not make any contribution on behalf of Alta, or use Alta's name, funds, personnel, or property in support of political candidates or parties, unless doing so is both legally permissible and authorized in advance by Alta's Chief Legal and Compliance Officer. You also must not pressure another Alta employee to express a political view or contribute to a political candidate, party, or political action committee. Federal law, as well as many states' laws, restricts companies such as Alta from making contributions or otherwise supporting political candidates. Alta has established a Political Action Committee, the **Westwood College Inc. Fund for Educational Excellence**, to ensure our faculty and staff has a means to express their concerns and interests to lawmakers with a united voice.

Your relationships with governmental representatives should be conducted in such a way that, if publicly disclosed, they would not reflect poorly on you, the representative, or Alta. Activities that could influence governmental officials and employees are carefully regulated. In your role as an Alta employee, you must avoid even the appearance of impropriety in your dealings with governmental representatives. You may extend reasonable entertainment and courtesies so long as they are not prohibited by law, and then only to the extent customary and appropriate under the circumstances. If you have questions regarding such matters, please contact Alta's Chief Legal and Compliance Officer.

## **Computer and Network Security**

Alta's computer systems, networks, and electronic data are critical to its business. You must do your part to maintain the integrity and security of the systems, networks, and electronic data processes in our systems by protecting passwords, user IDs, and access to Alta facilities. Alta provides computing and network services to members of its educational community, typically at no cost to those users. Those services, as well as the hardware associated with providing them and all information transmitted by, received from, or stored on or in them, are Alta property. Use of these computing and network resources is limited to authorized users (enrolled students attending classes and Alta employees). All use of these systems, including electronic mail, Internet access, telephone systems, computer systems and network, generally should be limited to legitimate Alta business or educational purposes. Any non-Alta commercial or other use of these resources is prohibited.

## **EMPLOYEE RELATIONS**

Alta is an equal opportunity employer. Alta is committed to providing a work environment that is free of discrimination and harassment. This means that Alta will not tolerate employment discrimination and harassment based on sex, race, age, disability, sexual orientation, religion, veteran status, national origin, color, creed, ancestry, marital status, or any other protected class or status. The same is true with respect to students and prospective students, and with respect to dealings with any other customers, business partners, or stakeholders. All Alta employment decisions are made without regard to sex, race, age, disability, sexual orientation, religion, veteran status, national origin, color, creed, ancestry, marital status, or any other reason prohibited by law.

Alta prohibits any form of harassment in the workplace, including sexual harassment. Alta will take prompt and appropriate action to prevent and discipline behavior that constitutes harassment. Alta expects employees to interact with each other in a professional and respectful manner.

### **Workplace Safety/Drugs and Alcohol**

Alta strives to provide safe, healthful facilities for employees, students, and visitors. You must observe all safety and health rules, practices, and laws that apply to your job, and must take precautions necessary to protect yourself and others, including your co-workers, students, and visitors at Alta facilities. Please immediately report accidents, injuries, or occupational illnesses and unsafe practices or conditions to your supervisor or a Human Resources representative.

Threats of violence, acts of violence, physical intimidation, and the possession of weapons of any type while on the job or on Alta premises are all prohibited. We will not tolerate talk of violence, or joking about violence.

The use, possession, distribution, manufacture, or sale of illegal drugs or alcohol on Alta premises, on Alta time, or in connection with Alta business is prohibited.

Alta reserves the right to have any of its employees tested for drug or alcohol use if there is a reasonable suspicion that an employee is under the influence of drugs or alcohol. If you are using prescription or non-prescription medication that may impair your alertness or judgment, and thus potentially jeopardize your safety or the safety of others, you must advise your supervisor of your condition.

*Q: I recently heard a funny joke that I think some of my co-workers will find amusing, but it contains some crude language and sexual innuendo. Can I tell the joke to my fellow co-workers?*

*A: No. Even though you think the joke is funny, there is a chance that your co-workers may find it to be offensive. If you think there is a slight chance that it might be deemed offensive by anyone at work, then it is best not to share it at work.*

## **COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS**

Alta is committed to conducting its business honestly and with integrity, in compliance with all applicable laws and regulations of government agencies and authorities. This specifically includes requirements under the Higher Education Act, as amended, regulations of the United States Department of Education, the policies of accrediting agencies, as well as other state and federal laws. If federal, state or local law exists that is either contradictory or stricter than this policy, employees must apply the law.

### **Responsible Management of Government Funds**

Government regulations prohibit Alta from participating in any federal student financial aid program under Title IV of the Higher Education Act of 1965, if Alta has any person in its employ or contracts with any person or organization that has been convicted of, or has pleaded no contest or guilty to, any crime involving the acquisition, use, or expenditure of federal, state, or local government funds, or has been judicially or administratively determined to have committed fraud or any material violation involving federal, state, or local government funds.

In order to ensure that Alta complies with these regulations, you must certify in writing, as a condition of your employment, that no such convictions, pleas, or determinations of any kind have been made by or with respect to you, and that, to your knowledge, the same is true as to any Alta contractor. If it is discovered that you have been convicted of, pled to, or had such a determination made with respect to you as to such matters, Alta will terminate your employment immediately.

An Alta student finance professional is expected to always maintain exemplary standards of professional conduct in all aspects of carrying out his or her responsibilities, specifically including all dealings with any entities involved in any manner in student financial aid. In doing so, in addition to abiding by all other matters in this Code of Conduct, student finance professional should also:

- Refrain from taking any action he or she believes is contrary to Alta's policies, law, regulation, or the best interests of the students and parents he or she serves. Students and parents' interests are always best served by assuring that their financial aid applications are accurate and truthful.
- Ensure that the information he or she provides is accurate and unbiased and when uncertain seek appropriate assistance before providing any information.
- Be objective in making decisions and advising students and their parents. Strive to assure that students and their parents fully understand their financial aid award and the repayment obligations related to their federal student loans.

## **GOVERNMENT AND MEDIA INQUIRIES**

### **Governmental Inquiries**

Alta will cooperate with governmental agencies and authorities when they make lawful requests for information. All information provided in response to such requests must be truthful and accurate. It is never appropriate to mislead a governmental investigator or to alter or destroy records or documents requested by a government as part of an investigation. If you are contacted by a law enforcement agency or other governmental body to provide information relating to Alta, please contact Alta's Chief Legal and Compliance Officer.

### **Media Inquiries**

All media inquiries should be forwarded to Alta's Chief Communications Officer for response to ensure consistent, professional handling of such matters.

## **REPORTING ACTUAL OR SUSPECTED CODE VIOLATIONS**

Your failure to follow the Code can compromise Alta's reputation. You cannot justify unethical or illegal acts by saying that they helped Alta's business results, served or purports to serve the interests of a student or that you were directed to act by someone holding a higher position at Alta. You are responsible for your conduct as an Alta employee, and you are never authorized to violate, or to direct someone to violate, the Code.

If you observe, know of or have good grounds to believe that an action is unethical, unlawful or a violation of this Code, you have an obligation and duty to communicate that information to one of the following:

- Contact your supervisor – supervisors are responsible for determining how compliance matters should be handled.
- Contact the relevant functional area – for example, employment issues should be reviewed with Human Resources.

If contacting your supervisor or the relevant functional area is not feasible under the circumstances (for example, because you believe they would be unable to review the known or suspected violation objectively), contact the:

- Chief Legal and Compliance Officer;
- Alta Employee Ethics Hotline at [www.MySafeWorkplace.com](http://www.MySafeWorkplace.com) or 1-800-461-9330.

Reports of Code violations will be promptly investigated. Employees are expected to cooperate with any investigation. Reasonable measures will be taken to preserve confidentiality of the claim and identity of anyone who reports a suspected violation or participated in the investigation. Individuals who report in order to harass or punish another person will be subject to appropriate disciplinary measures.

### **No Retaliation**

Alta encourages you to take any problems, disagreements, questions, comments, or recommendations to your supervisor, a Human Resources representative, or any member of Alta's management team. Any form of retaliation or other adverse employment action taken against an employee who reports in good faith a suspected violation of the law or the Code, or for assisting with the investigation of a suspected violation, is prohibited. Report any such conduct to the Chief Legal and Compliance Officer immediately; such conduct is a violation of the Code. Making an intentionally false report or allegation of a violation of the Code is itself a violation of the Code.

Alta takes a zero tolerance approach to violations of this Code, failure to report actual or suspected violations of the Code, or retaliation against whistleblowers. Employees that are found to have violated this Code or retaliated against whistleblowers will be subject to a full range of disciplinary action by Alta, up to and including termination of their employment. Where appropriate, Alta also has an obligation to report certain activities to its regulators, which could result in a separate regulatory or criminal investigation.

### **If You Need Help or Advice**

If you have questions or concerns about a potential ethics or compliance issue or matter, you should discuss it with your supervisor, with a member of the Human Resources staff, or with the Chief Legal and Compliance Officer.

If you would like to seek confidential advice or report a suspected violation anonymously, contact the Alta Employee Ethics Hotline at [www.MySafeWorkPlace.com](http://www.MySafeWorkPlace.com) or 1-800-461-9330.

### **Waiver**

Alta does not expect to waive the application of the Code. If you nevertheless believe that a particular set of circumstances warrants a waiver of a provision of the Code, contact the Chief Legal and Compliance Officer.

**ALTA COLLEGES, INC.  
CODE OF BUSINESS CONDUCT AND ETHICS  
ANNUAL CERTIFICATION**

Alta requires every employee to read and sign the following acknowledgment within 30 days of receipt of this Code. Please complete and sign the acknowledgement below and send it to Compliance Department at 7604 Technology Way, Suite 400, Denver, Colorado 80237. If you have any questions, please contact your supervisor or, in their absence, any of the parties listed at the end of this Code.

I acknowledge that I have read Alta College's Code of Business Conduct and Ethics and understand and agree to abide by its requirements.

I understand my responsibility to promptly report any incident of misconduct or perceived misconduct that I may experience or witness. I further understand that Alta takes a zero tolerance approach to violations of this Code, and that violation of the Code or retaliation against anyone who reports a violation in good faith will result in disciplinary action up to and including termination.

Employee Name (printed): \_\_\_\_\_

Employee Signature: \_\_\_\_\_

Campus/Office Location: \_\_\_\_\_ Date: \_\_\_\_\_

**Code of Business Conduct and Ethics Resources:**

Throughout this document you were directed to contact certain individuals or departments with questions or concerns. Specific names, phone numbers and email addresses for each of those is provided below.

**Human Resources Department:**

Evelyn Falk, Vice President, Human Resources

[efalk@westwood.edu](mailto:efalk@westwood.edu)

303-846-1669

**Chief Legal Counsel and Compliance Officer:**

Bill Ojile, Senior Vice President-Chief Legal Counsel and Compliance Officer

[bojile@westwood.edu](mailto:bojile@westwood.edu)

303-846-1836

**Chief Communications Officer:**

Kristina Yarrington, Vice President, Marketing

[kyarrington@westwood.edu](mailto:kyarrington@westwood.edu)

303-846-1810

**Employee Ethics Hotline:**

MySafeWorkplace

[www.mysafeworkplace.com](http://www.mysafeworkplace.com)

800-461-9330