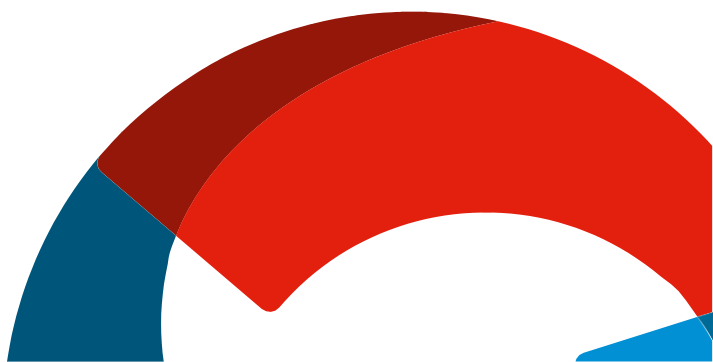


GLOBAL: EDUCATION AGENT CODE OF CONDUCT



INTRODUCTION

Study Group expects the highest standards of ethical conduct from anyone with whom we do business. Acceptance of our Code of Conduct and adherence to its provisions are required to establish and maintain status as an Education Agent for Study Group. The Code of Conduct forms a part of our Agent Agreement and Terms and Conditions (collectively, "Agent Agreement").

CODE OF CONDUCT

While all Education Agents are independent of Study Group, compliance with the following expectations is required to maintain an Education Agent relationship with Study Group.

A. Compliance with Applicable Law and Regulations.

We expect our Education Agents to:

- (i) be knowledgeable of all applicable laws and regulations;
- (ii) comply with all applicable laws and regulations;
- (iii) ensure that all employees, contractors, and sub-agents (if permitted) comply with all applicable laws and regulations; and
- (iv) notify Study Group if you become aware of any actual or potential non-compliance with the Agent Agreement or any applicable laws and regulations.

B. Books and Records

Education Agents are expected to ensure that all financial and other books and records related to business with Study Group, including students and potential students, accurately reflect events and transactions. Education Agents must not falsify documents, transaction records, accounting records, or any other records related to a Study Group transaction or student or potential student.

C. Act with Integrity

Education Agents are expected to:

- (i) act with the highest levels of ethics and integrity at all times;
- (ii) declare any conflicts of interest relating to Study Group business in writing and take all reasonable steps to avoid or mitigate any conflicts of interest;
- (iii) implement policies, procedures and regular training for employees, agents, and contractors to prevent bribery, fraud, or other corrupt behaviour, and to ensure that any suspect activity will be promptly detected and reported to appropriate authorities and to Study Group; and
- (iv) implement policies, procedures and regular training for employees, agents and contractors to ensure compliance with applicable data protection laws and protection of intellectual property.

D. Use of Sub-Agents

Education Agents are prohibited from using sub-agents unless such use has been expressly approved in writing by Study Group in the Agent Agreement and the Agent complies at all times with the additional terms and conditions in the Agent Agreement related to use of sub-agents.

E. Marketing

Education Agents must not:

- (i) undertake any advertising or promotional activity on behalf of Study Group without prior written consent;
- (ii) engage in false or misleading advertising or recruitment practices, or offer discounts or scholarships without prior written permission from Study Group;
- (iii) discount any Study Group courses/programmes further than the listed or special promotion price without the prior written approval of Study Group;
- (iv) advertise or promote themselves as the course/programme provider;
- (v) make any representations or offer any guarantees to students about whether they will be granted a student visa;
- (vi) misrepresent or offer assurances regarding the potential employment outcomes of completing a course/programme;
- (vii) make any false or misleading comparisons with any other education provider or their courses/programmes;
- (viii) make any inaccurate claims of the association of Study Group with any other education provider;
- (ix) deduct any amount from the fees and charges payable to Study Group by a student;
or
- (x) discriminate or tolerate discrimination of any kind.

F. Interaction with Students, Potential Students, and their Families

Education Agents must:

- (i) be clear to all parties about their role and remit throughout the application process and declare any conflicts of interest to all prospective students;
- (ii) ensure that students are aware that the Education Agent will receive commission for the enrolment of the student on their chosen course/programme;
- (iii) recognise the power of influence with their role and refrain from using that influence for self-interest and/or to the detriment of a student or potential student;
- (iv) assess each student's desire and capacity to participate in and complete their preferred course/programme and refrain from submitting applications for students determined to not have education as their first priority;
- (v) never facilitate applications for students who do not comply with visa regulations, or suggest that a student can use a student visa for any other purpose than full time study;
- (vi) ensure that there is no direct government endorsement within a student's application;
- (vii) never provide students with migration advice, unless authorised to do so by applicable law and regulation, including in Australia the OMARA regulations;
- (viii) provide complete, truthful, and accurate information about themselves, any permitted sub-agents being used, and Study Group;
- (ix) provide students with correct and up to date information about the course/programme, including the content, duration, all pre-requisites, all relevant fees/annual fee increases and refunds policies, visa requirements, and any other important

- information which the student needs in order to make an informed decision;
- (x) be clear, transparent, and impartial throughout the application process;
 - (xi) maintain strict confidentiality of student data and always comply with data protection legislation for the applicable location in which the student intends to study;
 - (xii) not disclose information about students to anyone other than Study Group without written consent, unless legally required to by a government agency with confirmed legal jurisdiction;
 - (xiii) always act in the best interest of students;
 - (xiv) ensure that students are fully informed of the procedures to pursue complaints;
 - (xv) keep documented evidence of decisions reached, especially relating to performance, reward, and marketing activities; and
 - (xvi) refrain from becoming involved in personal relations with students, prospective students and/or family members of students or prospective students.

PROSPECTIVE STUDENTS UNDER AGE 18

When recruiting students under the age of 18, Education Agents must take the following additional steps:

- ensure that the student has adequate representation and support from a guardian and/or legal representative during any meetings;
- ensure that all applications for admission for students under the age of 18 are also signed by their parent or guardian;
- never accept money or other payment for a course/programme directly from an under 18 student without written consent of an authorized guardian and/or legal representative (payments should be made by parents/guardians/legal representatives); and
- always act in a manner consistent with protecting the health, safety, and welfare of the prospective student.

G. Consequences of Non-Compliance

Failure to comply with this Code of Conduct may lead to immediate termination of the Agent Agreement. Conduct violating law and/or regulation will be reported to applicable authorities, as warranted.

H. Questions

For questions concerning this Code of Conduct or Study Group expectations of Education Agents, please contact channelmanagement@studygroup.com.

APPENDIX

The following are links to useful Statutory Acts for reference. Inclusion of this Appendix does not excuse the obligation of the Education Agent to remain informed of all applicable law and regulation, as passed, adopted, updated, or modified from time to time.

UK

- [Statement of Principles for the Ethical Recruitment of International Students by Education Agents and Consultants \(The London Statement\)](#)
- [UKCISA Code of Ethics and its Commentary](#)
- [British Council: Guide to Good Practice for Education Agents](#)
- [Data Protection Act 2018](#)

Australia

- [Education Services for Overseas Students \(ESOS\) Act](#)
- [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#)
- [Australian International Education and Training Agent Code of Ethics](#)
- [TEQSA: Provider Responsibilities when Using Education Agents](#)
- [Privacy Act 1988](#)

New Zealand

- [Education \(Pastoral Care of Tertiary and International Learners\) Code of Practice 2021](#)
- [International Student Contract Dispute Resolution Scheme Rules 2016](#)
- [NZQA rules](#)
- [Privacy Act 2020](#)
- [Statement of Principles for the Ethical Recruitment of International Students by Education Agents and Consultants](#)