



ALTA COLLEGES, INC.

CODE OF BUSINESS CONDUCT AND ETHICS

Revised March 2008



Dear Colleagues:

The good name and reputation of Alta Colleges, Inc., and its operating divisions, Westwood College, Westwood College Online and Redstone College, are the result of the dedication and hard work of its employees. We are all proud of Alta and the reputation it has earned, and together we are responsible for preserving and enhancing this reputation. Our goal is that directors, officers and employees of Alta always conduct themselves with the highest standards of business ethics and operate consistent with the laws and regulations that apply to our business. This Code of Business Conduct and Ethics is designed to reinforce and enhance our commitment to that goal.

I am confident that you share my view that we are all determined to protect and enhance Alta's reputation by doing the right things for the right reasons. We will not waiver from our commitment to conduct business, and to treat each other, as well as the students, communities, and others we serve, with honesty and integrity.

As employees, each of us must become familiar with this Code and follow it and the principles embodied in it. By doing so, we can ensure that our daily actions support and reaffirm our commitment that ethics and integrity are central to everything we do in support of Alta's business.

Thank you for following the Code in everything you do, and for all the things you do every day to support Alta's mission and enhance its reputation.

George Burnett
Chief Executive Officer

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Our Culture and the Code

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 our business activities. We must treat employees, students, business partners, the communities in which we operate, and others with honesty and integrity while we pursue Alta's business mission.

Our commitment to the highest standards of business ethics requires that we conduct our business in accordance with all applicable laws and regulations. The Alta Colleges, Inc. Code of Business Conduct and Ethics 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.

Our Shared Commitment

The Code applies to all directors and employees of Alta and its operating divisions, Westwood College, Westwood College Online and Redstone College, and to anyone acting on behalf of Alta. 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.

When in Doubt

If you find yourself in doubt about the appropriateness of certain conduct, 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, you should contact your supervisor. If for some reason you do not feel comfortable raising the issue with your supervisor, contact the Employee Ethics Hotline via the Web (www.MySafeWorkplace.com) or by calling 1-800-461-9330 to seek assistance.

* * *

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

- Comply with the letter and spirit of all applicable laws, rules, and regulations
- 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

Conflicts of Interest

You must avoid any conflicts of interest with Alta. A conflict of interest exists when your personal interests interfere with or could interfere with the interests of Alta. Simply put, you should always work in Alta's best interests in conducting Alta business. You must not compete with Alta, take personal advantage of a business opportunity that is presented when conducting Alta business, or use confidential or proprietary information that you gain on the job for your personal gain.

Relationships with existing or prospective suppliers, contractors, competitors, or others must be structured or arranged so that they could not reasonably appear to affect your independent judgment in acting on behalf of Alta. Any situation that might develop that creates or reasonably could appear to create a conflict of interest must be avoided and disclosed to your supervisor.

Conflicts of interest also can arise when you serve on the board of directors of a company or other entity. Please examine your service on boards of directors or other similar service for potential conflicts of interest.

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.

Relatives and Friends

Conflicts of interest may arise as a result of doing business with, or even competing with, entities that employ or are owned by (or even partially owned by) your friends or relatives. You cannot do indirectly (through friends, relatives, or others) what you are prohibited from doing directly. If your spouse, other relative, or friend is employed by, or has a significant interest in, an entity that is attempting to do business with Alta, you must not use your position to influence decisions about Alta doing business with that entity. If you would ordinarily be involved in making

that decision, you should disclose the relationship and situation to your supervisor as soon as you become aware of it.

A conflict of interest also can arise in situations in which your spouse, partner, or other person with whom you have a close personal relationship reports to you. You should not supervise or be in a position to influence the hiring, duties, or evaluation of such persons. If this situation exists or develops, you must notify your supervisor immediately.

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.

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) or by calling 1-800-461-9330.

Material Non-Public Information and Insider Trading

Although Alta is not a public company, we are of course committed to complying with all laws, rules, and regulations that may apply to the conduct of business. Federal and state securities laws and regulations govern transactions in securities (such as stocks and bonds) of companies, which could include Alta suppliers and other companies with which Alta does business. You violate the insider trading aspects of the securities laws if, while you are aware of material non-public information, you trade on that information or disclose it to others before that information is publicly disclosed. Material non-public information is any information concerning a public company's business, prospects, securities, or market that an investor might consider important in deciding whether to buy or sell securities. If you come into possession of such information in the course of your Alta duties, do not act on it by buying or selling securities or by sharing such information with others. Simply sharing such information (sometimes called "tipping") can violate the securities laws, and violations of such laws can lead to serious civil and criminal penalties.

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.

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.

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.

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

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. If you inadvertently or mistakenly come into possession of information that could be a trade secret or the proprietary information of another business or entity, notify Alta's Chief Legal and Compliance Officer.

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 and must be retained in accordance with applicable records retention policies.

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.

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.

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 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 supplies 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.

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.

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/Non-Discrimination/Harassment

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.

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 view your Alta-provided workspace.

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 not disclose private information in violation of applicable law or in violation of Alta's policies.

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.

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.

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.

Employee/Student Interactions

You should not enter into a personal, social, or romantic relationship with a student or prospective student. Such conduct is inconsistent with the obligations you have, as an Alta employee, to maintain a professional demeanor toward and relationship with students or prospective students. Thus, you are prohibited from pursuing a relationship with any student or prospective student that involves any interaction beyond the normal scope of the educational services that Alta provides to students.

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 other 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.

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.

Non-Exclusive Scope

The Code cannot cover explicitly every situation or circumstance that you may encounter. As indicated elsewhere, the Code is not a full, complete, or comprehensive explanation of the many laws, rules, and regulations that apply to Alta and to you as an Alta employee. Many of the subjects and issues discussed in the Code are treated in greater detail in other Alta materials, including Alta policies. You must familiarize yourself with such policies, and applicable laws, rules, and regulations; however, nothing serves as a substitute for common sense and good judgment.

If you believe that any provision of the Code conflicts with any Alta policy stated elsewhere, contact your supervisor. Generally speaking, you should assume that any such conflicts will be resolved in favor of the letter and spirit of the Code.

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.

Violations of the Code

Your failure to follow the Code can compromise Alta's reputation. Such a failure also may result in disciplinary actions, up to and including termination of employment. You cannot justify unethical or illegal acts by saying that they helped Alta's business results 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.

You must report violations of the law, the Code, or any other Alta policy. A failure to do so may subject you to disciplinary action, up to and including termination of employment. If you have a question about the Code or who needs to report a known or suspected violation of the Code, you should do one of the following:

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

If contacting your supervisor or the relevant business group 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
- the Alta Employee Ethics Hotline at www.MySafeWorkplace.com or 1-800-461-9330

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. This means that you may choose to resign your employment at any time, for any reason, or for no reason at all, and that Alta may choose to terminate your employment at any time, for any legal reason, or for no reason at all.

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 Human Resources, 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 or 1-800-461-9330.