SAGRADO
Universidad del Sagrado Corazón

MARKETING AND RECRUITMENT COMMUNICATIONS POLICY

I. Purpose

The purpose of this Policy is to establish the guiding principles governing Universidad del Sagrado Corazón ("Sagrado") marketing and recruitment communications activities. Members of the University community and third-parties entrusted with the responsibility over the marketing and recruitment communications activities are expected to perform appropriately compliant with both the letter and the spirit of the laws and regulations, and Sagrado's policies, procedures and guidelines, accreditation standards, as well as the applicable professional standards.

II. Scope

This Policy applies to all members of the University community including trustees, faculty members, administrative staff, student support services staff, students, alumni and third-parties, including, agents, contractors, volunteers, and others associated with the University engaged in marketing and recruitment communications activities developed by or on behalf of Sagrado.

III. Definitions

The Glossary of Terms provides the definitions to the terms most commonly used in this Policy and the Marketing and Recruitment Communications Procedure ("Procedure").

IV. Guiding Principles

Sagrado is committed to the highest standards of integrity and ethics when engaging internal and external stakeholders. Sagrado views communication as a strategic means of advancing its Mission and projecting a coherent institutional identity. Accordingly, the University follows recruitment communication and marketing practices grounded in principles of truthfulness, accuracy, accessibility, transparency, and accountability.

Externally, Sagrado runs campaigns that clearly and accurately communicate its academic offerings and student experience and, internally, Sagrado maintains a communication system that integrates downward, upward, and horizontal information flows.

A. All marketing and recruiting communications activities shall:

1. **Be truthful and accurate.** Claims about academic programs, accreditation, institutional achievements, rankings, tuition and fees, financial aid, scholarships, student outcomes, career opportunities, facilities, faculty, student services, and other institutional attributes must be accurate, current, and reasonably substantiated.
2. **Provide clear and complete information.** Recruitment communications shall not intentionally omit material information or present information in a manner that could reasonably mislead prospective students or other stakeholders.
3. **Be consistent with institutional mission and values.** Marketing and recruitment practices shall reflect Sagrado's mission, identity, educational purpose, and institutional values.

4. **Respect students and prospective students.** Recruitment practices shall be conducted in a manner that respects the dignity, privacy, autonomy, and informed decision-making of students and families.
5. **Maintain transparency regarding institutional relationships.** Sagrado shall appropriately disclose the role of external agencies, vendors, technology providers, or other third parties when their involvement is material to the communication, service, or student experience.
6. **Protect privacy and confidential information.** Marketing and recruitment activities shall comply with applicable privacy, data protection, intellectual property, copyright, and records-management requirements.
7. **Avoid conflicts of interest.** Employees, agencies, and vendors involved in marketing and recruitment shall disclose actual or potential conflicts of interest and comply with applicable Sagrado's conflict-of-interest as defined in the University Code of Ethical Conduct.
8. **Maintain accountability.** Final responsibility for materials published or distributed in the University's name remains with the University, regardless of whether the materials were developed internally or by an external agency.

B. Marketing and recruitment communications activities shall not:

1. Make false, deceptive, exaggerated, or unsupported claims.
2. Intentionally omit material information or present information in a manner that could reasonably mislead prospective students or other stakeholders.
3. Guarantee admission, employment, scholarships, financial outcomes, or other results when such outcomes cannot be guaranteed.
4. Misrepresent program requirements, costs, accreditation, transferability, graduation outcomes, employment opportunities, or other material information.
5. Create an unreasonable sense of urgency or pressure to enroll.
6. Intentionally target students with misleading or incomplete information.
7. Misrepresent the university's accreditation status, programs, services, or institutional relationships.

V. Use of Artificial Intelligence

Sagrado uses artificial intelligence ("AI") tools compliant with the laws and regulations, University policies and procedures, accreditation standards, and best practices to assist with marketing and recruitment communications including but not limited to the development, editing, translation, personalization, analysis, and production of materials.

VI. Incentive Compensation Ban

Sagrado does not provide any commission, bonus, or other incentive payment based directly or indirectly upon success in securing enrollments (recruitment activities); or the award of financial aid to any individual or entity engaged in any recruiting or admission activities or in making decisions about awarding *Title IV* program funds.

VII. Non-discrimination Policy

The University prohibits discrimination based on race, color, religion, sex (including sexual orientation and pregnancy), national and ethnic origin, age, physical or mental disability or genetic information, marital status, national and ethnic origin, citizenship, status as covered veteran, and any other characteristic protected by federal or local law.

VIII. Retention

The Chief Marketing and Admissions Officer must maintain a physical or electronic copy of all the communications in Sagrado's centralized electronic repository for a period of seven (7) years counting from the last date that the communication was disseminated.

IX. Questions About this Policy

Questions regarding the scope and interpretation of this Policy should be directed to Joyce M. Martínez González, Chief Marketing & Admissions Officer at: joyce.martinez@sagrado.edu.

X. Reporting Violations

Violations of this Policy should be directed to the Compliance, Audit, and Institutional Integrity Office at: cumplimiento@sagrado.edu.

Any violations of this Policy will be addressed in accordance with the University's policies and procedures. Universidad del Sagrado Corazón reserves the right to interpret this Policy in its administration, implementation, and enforcement. If there is any ambiguity in any provision of this Policy, the University reserves the discretion to interpret it in accordance with the purpose for which it was established, the impact to the University's operations, and good faith, unless otherwise provided by law.

Approved by:

Gilberto J. Marxuach Torrós
President
Date: October 21, 2026

Glossary of Terms

For purposes of this Policy and the Marketing and Recruitment Communications Procedure, these terms have the following meaning and apply both in singular and plural.

1. Communications - means a statement (external and internal) made in writing, orally, photography, electronic (e.g., digital, video, recording, social media) or through other means.

2. Conflict of Interest - includes a real conflict but also the appearance of a conflict of interest that may be: (a) a financial interest, (b) an employment relationship, (c) an immediate family relationship, (d) a sentimental relationship, or (e) any other relationship or interest that may divide loyalties and/or undermine or compromise the judgment of any member of the University community. For more information, refer to the University Code of Ethical Conduct and the *Procedure for the Disclosure of a Conflict of Interest*.

3. Marketing activities - include, but are not limited to:

    - advertising campaigns;
    - websites and landing pages;
    - social media content;
    - email campaigns;
    - brochures and viewbooks;
    - digital advertising;
    - videos and photography;
    - program collateral;
    - recruitment presentations;
    - admissions materials;
    - event materials;
    - outdoor advertising;
    - institutional publications;
    - rankings and awards communications; and
    - testimonials and student stories.

4. Recruitment activities (securing enrollments) - means any activity or targeted effort intended to contact, interview, or encourage a prospective student to enroll including but not limited to:
    - Targeted information dissemination to individuals
    - Solicitations to individuals;
    - Contacting potential enrollment applicants; and
    - Aiding students in filling out enrollment application information.

5. Securing (award of) financial aid - means completing financial aid applications on behalf of prospective applicants (including activities that are authorized by the Department of Education, such as the FAFSA Partner Portal, which can be used to enter, correct, verify, or analyze financial aid application data).

6. Third-Party Providers - means a creative agency or contractor hired by the University under a written agreement to provide marketing, advertising, communications, or public relations.