

Farm Credit Foundations Code of Ethics

Overview

Farm Credit Foundations (“Foundations”) has adopted this code of ethical conduct (the “Code”) which is applicable to every director, officer, and employee. The Code reaffirms the high standards of business conduct required of and provides guidance to Foundations and its directors, officers, and employees.

Objective

Foundations is committed to conducting business in accordance with the highest ethical standards as set forth in the Standards of Conduct Policy. Moreover, Foundations is responsible for preparation and distribution of its financial statements and related disclosures and for providing relevant information that is true, accurate and complete to the Funding Corporation for use in preparing the Farm Credit system financial statements and related disclosures.

Accordingly, Foundations expects all of its directors, and employees to maintain the highest standards of personal and professional integrity in all aspects of their business transactions and activities. This includes complying with all applicable laws, rules, and regulations, deterring wrongdoing and abiding by its Standards of Conduct Policy and other policies and procedures adopted by Foundations that govern the conduct of its employees. To achieve these high ethical standards, all directors, and employees should, among other things, avoid conflicts of interests.

This Code is intended to supplement Foundations Standards of Conduct Policy.

Requirements

A. All Directors, Officers, and Employees. All directors, officers, and employees, are required to:

1. Maintain high ethical standards, including high standards of honesty, integrity, and fairness.
2. Act in the best interests of the institution.
3. Preserve the reputation of the institution and the public’s confidence in the Farm Credit System.
4. Exercise diligence and good business judgement in carrying out official duties and responsibilities.
5. Identify and disclose to the Standards of Conduct Official any conflicts of interest and/or circumstances or transactions that have the appearance of creating a conflict of interest.
6. Refrain from participating in official action or discussion on any matter if you have an actual or perceived conflict of interest.
7. Work with the Standards of Conduct Official to identify conflicts and resolve reported conflicts of interest and appearances of conflicts of interest.
8. Avoid self-dealing or acceptance of gifts or favors that may be deemed as offered, or have the appearance of being offered, to influence official actions or decisions.
9. Comply with all applicable laws, rules, and regulations, as well as the rules and regulations of self-regulatory agreements to which Foundations is a party.
10. Promptly report any possible illegal or unethical activity, or violation of the Standards of Conduct Policy and the Code to the Standards of Conduct Official or through the Whistleblower program, anonymous reporting procedures

11. Take all reasonable measures to protect the confidentiality of non-public information about Foundations and its customers obtained or created in connection with its activities and to prevent the unauthorized disclosure of this information unless required by applicable law or regulation, or legal or regulatory process.

B. Directors and Officers. In addition, directors and officers are required to produce full, fair, accurate, timely and understandable disclosures of Foundations financial statements and related financial reports or communications as well as reports and documents filed with, or submitted to, AgriBank, FCB and the Farm Credit Administration. Directors and officers are explicitly prohibited from taking any action to fraudulently, coerce, manipulate, or mislead Foundations independent public accountant for the purposes of rendering Foundations financial statements misleading.

Policy Compliance

Each director, officer, and employee is responsible for reading and understanding this policy, and conducting their activities and business transactions accordingly.

Foundations reserves the right to audit/monitor systems on a periodic basis to ensure compliance with this policy. Compliance may be measured through various means, including but not limited to business tool reports, internal and external audits, and feedback.

Any exception to this procedure must be submitted to, and approved by, Foundations Standards of Conduct Official.

Violations of the Code of Ethics

All directors and employees will be held accountable for adherence to this Code. A failure to observe the terms of this policy may result in disciplinary action, up to and including termination of employment or removal from the board of directors, as applicable. Violations of the Code also constitute violations of law and may result in civil or criminal penalties.

If you have any questions regarding the best course of action in a particular situation, contact the Standard of Conduct Officer.

Acknowledgement

Each director, officer, and employee shall be required to sign a statement annually that he or she has read and understands this Code.

Definitions

Conflicts of Interest: A set of circumstances or the appearance thereof where a person has a financial interest in a transaction, relationship, or activity that could or does actually affect (or has the appearance of affecting) that person's ability to perform official duties and responsibilities in a totally impartial manner and in the best interest of Foundations when viewed from the perspective of a reasonable person with knowledge of the relevant facts.

Employee: Any individual employed on a part-time, full-time, or temporary basis by Foundations, including those identified as officers of the institution. However, persons not maintained on the institution's payroll (i.e., independent contractors and temporary workers provided through temporary services agencies) are not employees for purposes of this definition.

Officer: The salaried Chief Executive Officer, President, Vice President, secretary, and Chief Financial Officer of the System institution, and any person not so designated but who holds a similar position of authority.