

**Farm Credit Mid-America Code of Ethics**  
**Directors, Officers, Senior Financial Professionals and Internal Auditors**

Farm Credit Mid-America, ACA, Farm Credit Mid-America, FLCA, Farm Credit Mid-America, PCA (hereinafter collectively referred to as the “Association”) and its directors, officers and employees have committed to conduct business in accordance with the highest ethical standards as set forth in the Association’s Standards of Conduct Policy. The Conduct Policy is applicable to the directors, officers and employees relating to ethical conduct, conflicts of interest, and compliance with the law.

This Code of Ethics applies to all Association directors, officers, senior financial professionals and internal auditors. The Association is responsible for the preparation and distribution of its financial statements and related disclosures and for providing relevant information that is true, accurate and complete to AgriBank for use in preparing the District financial statements and related disclosures. The Association expects all of its directors and employees to act in accordance with the highest standards of personal and professional integrity in all aspects of their activities, to comply with all applicable laws, rules and regulations, to deter wrongdoing and abide by its Standards of Conduct Policy and other policies and procedures adopted by the Association that govern the conduct of its directors and employees. This Code of Ethics is intended to supplement the Association’s Standards of Conduct Policy.

You agree to:

- a. Engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
- b. Avoid conflicts of interest and disclose to the Standards of Conduct Officer or Human Resources any material transaction or relationship that reasonably could be expected to give rise to a conflict.
- c. Take all reasonable measures to protect the confidentiality of non-public information about the Association and its customers obtained or created in connection with its activities and to prevent the unauthorized use and/or disclosure of this information.
- d. Work to achieve full, fair, accurate, timely and understandable disclosure in the Association financial statements and related financial reports or communications as well as the Association reports and documents filed with, or submitted to, AgriBank and the Farm Credit Administration.
- e. Comply with applicable governmental laws, rules and regulations, as well as the rules and regulations of self-regulatory agreements to which the Association is a party.
- f. Promptly report any possible or actual violation of this Code of Ethics to the Standards of Conduct Officer or Human Resources.

You are prohibited from directly or indirectly taking any actions to influence, coerce, manipulate or mislead the Association's independent public accountant for the purpose of rendering the financial statements misleading.

You understand that you will be held accountable for adherence to the Code of Ethics. Your failure to observe the terms of this Code of Ethics may result in disciplinary action, up to and including resignation from the board of directors or termination of employment. Violations of the Code of Ethics may also constitute violations of law and may result in civil and criminal penalties for individuals or the Association.

If you have any questions regarding the best course of action in a particular situation, you should promptly contact the Standards of Conduct Officer or Human Resources. You may make an anonymous report of possible violations of this Code of Ethics by contacting Ethics Point at [e-farmcredit.ethicspoint.com](mailto:e-farmcredit.ethicspoint.com) or 1.866.294.3552.

Farm Credit Mid-America prohibits retaliation against anyone who, in good faith, reports a concern.