



## **FARM CREDIT OF SOUTHERN COLORADO'S CODE OF ETHICS**

Farm Credit of Southern Colorado (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 Standards of Conduct Policy, which is applicable to all directors, officers, and employees and which relates to ethical conduct, conflicts of interest, and compliance with the law.

This Code of Ethics applies to all employees and directors. 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 the Funding Corporation for use in preparing the Farm Credit System financial statements and related disclosures. The Association expects all of its 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 to abide by its Standards of Conduct Policy and other policies and procedures adopted by the Association that govern the conduct of its employees. This Code of Ethics is intended to supplement and be construed as part of the Association's Standards of Conduct Policy and Standards of Conduct Manual (the "Manual").

Each person to whom this Code of Ethics applies agrees to:

- A. Act in accordance with the highest standards of personal and professional integrity in all aspects of his/her activities, to comply with all applicable laws, rules, and regulations, to deter wrongdoing, and to abide by its Standards of Conduct Policy and other policies and procedures adopted by the Association that govern the conduct of its employees.
- B. Engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships, and promote compliance with applicable laws, rules, regulations, and guidance governing standards of conduct.
- C. Avoid conflicts of interest and disclose to the Standards of Conduct Official any transaction or relationship that is required to be disclosed or that is material and could reasonably be expected to give rise to a conflict.
- D. Adhere to any additional industry or professional ethics standards that are applicable to him/her in his/her work for or representation of the Association.
- E. Report, and avoid engaging in, conduct involving dishonesty, deceit, fraud, corruption, or operational weakness and discourage any conduct or action that reflects negatively on the reputation, integrity, or competency of the Association or the Farm Credit System.
- F. Promote integrity throughout the Association and its activities through adherence to this Code of Ethics and the Association's policies and procedures relating to standards of conduct.
- G. Promptly report to the Standards of Conduct Official any matter that violates or may violate this Code of Ethics, the Association's policies or procedures relating to standards of conduct, or that may require further investigation or reporting under the laws, rules, and regulations application to the Association, including matters made subject of 12 CFR § 612.2301.
- H. Take all reasonable measures to protect the confidentiality of non-public information about the Association and its customers obtained or created in connection with the Association's activities and to prevent the unauthorized disclosure of this information unless required by applicable law or legal or regulatory process.

- I. Produce full, fair, accurate, timely, and understandable disclosures in Association reports and documents filed with, or submitted to, the Farm Credit Administration, in information provided to the Funding Corporation, and in other public communications made by the Association.
- J. Comply with applicable laws, rules, regulations, and Association policies, as well as the rules and regulations of self-regulatory agreements to which the Association is a party.
- K. Promptly raise questions, issues, and concerns to the Standards of Conduct Official regarding any violation or possible violation of this Code of Ethics or the Association's policies and procedures relating to standards of conduct, any matter relating to the accuracy of the financial statements of the Association, or any matter that may require further investigation or reporting under the laws, rules, and regulations application to the Association, including matters made subject of 12 CFR § 612.2301 and matters involving possible fraud, corruption, or operational weakness.

Each person to whom this Code of Ethics applies is prohibited from directly or indirectly taking any action to fraudulently influence, coerce, manipulate, or mislead the Association's independent public accountant for the purpose of rendering the financial statements of the Association misleading.

Each person to whom this Code of Ethics applies understands that he/she will be held accountable for adherence to the Code of Ethics; his/her failure to observe the Code of Ethics may result in disciplinary action, up to and including termination of employment, if and as applicable. Violations of the Code of Ethics may also constitute violations of law and may result in civil and criminal penalties for him/her, his/her supervisors, or the Association.

Please report any possible violation of this Code of Ethics to EthicsPoint by:

- Toll-Free Telephone: (866) 384-4277
- Website: <https://secure.ethicspoint.com>

EthicsPoint is an independent provider of certain communication systems and services.

Any individual who contacts EthicsPoint will remain anonymous when reporting any possible violation of this Code of Ethics through EthicsPoint to the extent permitted by law.

Updated: April 2018.