



FARM CREDIT OF SOUTHERN COLORADO, ACA CODE OF ETHICS

Farm Credit of Southern Colorado, ACA (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 (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, officers, and directors including but not limited to the Association financial professionals as determined by the CEO, who are instrumental in accomplishing accurate and complete financial reporting. 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 (System) financial statements and related disclosures. The Association expects all of its officers, 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 to abide by its Policy and other policies and procedures adopted by the Association that govern the conduct of its officers, directors and employees, as applicable. This Code of Ethics is intended to supplement and be construed as part of the Association's Policy and Standards of Conduct Manual (Manual).

Each board member, officer and employee of the Association pledges and agrees to:

- A. 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 the Policy, this Code of Ethics, and other policies and procedures adopted by the Association that govern the standards of conduct, as well as the rules and regulations of self-regulatory agreements to which the Association is a party.
- 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 comply and promote the compliance with applicable laws, rules, regulations, and guidance governing standards of conduct.
- C. Act in the best interest of the Association and preserve the reputation of the Association and the public's confidence in the System.
- D. Exercise diligence and good business judgement in carrying out official duties and responsibilities.
- E. Avoid self-dealing and acceptance of gifts or favors that may be deemed as offered, or have the appearance of being offered to influence official actions or decisions.



- F. Promptly disclose to the Standards of Conduct Official any possible conflicts of interest or any action, transaction or relationship that is required to be disclosed or that is material and could reasonably be expected to violate any applicable laws or regulations, this Code of Ethics or other policies of this Association.
- G. Work with the Standards of Conduct Official to identify conflicts and resolve reported conflicts of interest and appearances of conflicts of interest.
- H. Adhere to any additional industry or professional ethics standards that are applicable in their work for or representation of the Association.
- I. 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 System.
- J. 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.
- K. 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.
- L. 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 discovery, 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.
- M. If an officer or director, fulfill their fiduciary duties to the Association.

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 they will be held accountable for adherence to the Code of Ethics; their failure to observe the Code of Ethics may result in disciplinary action, up to and including termination of employment, removal from office or Board of Directors, 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 them, their supervisors, or the Association.



Please report any possible violation of this Code of Ethics to Red Flag Reporting by:

- a. Toll-Free Telephone: 1 (877) 647-3335
- b. Website: <https://RedFlagReporting.com>

Red Flag Reporting is an independent provider of certain communication systems and services.

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

Updated: March 2024.