

Standards of Conduct Policy: Directors, Officers and Employees

Policy Applicable: All FPI Directors, Officers and Employees

Policy Owner: Mary Mazza

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Standards of Conduct Official: AnnaMaria Kiaresh

PURPOSE AND OBJECTIVES

At Farm Credit Financial Partners, Inc. (*hereinafter* “FPI” or “Company”), it is essential to maintain high standards of care, honesty, integrity, fairness, and conduct by **all FPI’s Directors, Officers, and Employees** to ensure the proper performance of the FPI’s business and continued public confidence in the Farm Credit System as a safe and reliable source of credit for agriculture and rural America. All FPI Directors, Officers, and Employees shall observe the highest standards of conduct in the discharge of their duties and responsibilities. To achieve these high standards of conduct, Directors, Officers, and Employees shall observe, to the best of their abilities, the letter and intent of all applicable laws, regulations, policy statements, instructions and procedures of the Farm Credit Administration (“FCA”), including the Standards of Conduct (SOC) regulations at [12 C.F.R. Part 12](#).

The purpose of this Standards of Conduct Policy (the “Policy”) is to provide guidance to Directors, Officers, and Employees by establishing expectations of conduct and processes for identifying and resolving Conflicts of Interest. All Directors, Officers and Employees will receive a copy of this Policy. It is important that they review this Policy and remain current with SOC training. The Standards of Conduct Official (“SOCO”) is available to respond to your questions and provide guidance.

OPERATIONAL PROCESSES

I. Definitions

For purposes of this Policy, the following terms are defined as set forth below:

Act: The Farm Credit Act of 1971, as amended.

Agent: Any person, other than a Director or Employee of FPI, with the power to act for FPI either by contract or apparent authority and who currently either represents FPI in contacts with third parties or provides professional or fiduciary services to FPI.

Code of Ethics: A written statement of the principles and values FPI follows to establish a culture of ethical conduct for Directors, Officers, and Employees, including, at a minimum, the core principals established under 12 C.F.R. § 612.2135.

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 interests of FPI when viewed from the perspective of a reasonable person with knowledge of the relevant facts.

Director: A member of FPI's Board of Directors (the "Board").

Employee: Any individual employed on a part-time, full-time, or temporary basis by FPI, including those identified as Officers of FPI. Persons not maintained on FPI's payroll (i.e., independent contractors) are not Employees for purposes of this definition.

Entity: A corporation, company, association, firm, joint venture, partnership (general or limited), trust (business or otherwise), or other business operations whether or not incorporated.

Family: Parents, spouses or civil union partners, children, siblings, uncles, aunts, nephews, nieces, grandparents, grandchildren, and the spouses of the foregoing whether arising from biological, adoptive, marital, or other legal means (e.g., stepparents, stepchildren, half-siblings, in-laws). The term also includes anyone residing in the household or who is a legal or financial dependent, regardless of any familial relationship.

Financial Interest: An interest in an activity, transaction, property, or relationship with a person that involves receiving or providing something of monetary value or other present or deferred compensation.

Financially Obligated With: Having a legally enforceable joint obligation with, being financially obligated on behalf of (contingently or otherwise), having an enforceable legal obligation secured by property owned by another person, or owning property that secures an enforceable legal obligation of another.

FPI's Farm Credit customers: Farm Credit System Institutions chartered under the Farm Credit Act who continue to maintain their organization and governing documents under the authority of the Farm Credit Administration that are members of FPI's collective organizations either as a shareholder of the cooperative or as a Farm Credit System Institution who obtains services from FPI's cooperative. FPI's current Farm Credit customers include:

- Customer Owners:
 - AgCountry Farm Credit Services ACA, PCA, FLCA
 - Farm Credit East ACA, PCA, FLCA
 - Farm Credit Illinois ACA, PCA, FLCA
 - Farm Credit West ACA, PCA, FLCA
 - Northwest Farm Credit ACA, PCA, FLCA
- Non-owner customers receiving services:
 - Fresno Madera Farm Credit
 - Farm Credit Council
 - CoBank, ACB

Farm Credit Banks. Are the Farm Credit's regional wholesale banks (i.e. CoBank, AgriBank, AgFirst and Farm Credit Bank of Texas), that fund the individual Farm Credit associations who support farmers, ranchers and rural homebuyers.

Material: The interest or transaction (or series of transactions viewed in the aggregate) is of such magnitude that a reasonable person with knowledge of the relevant facts would question the ability of the person who has the interest or is a party to such transaction(s) to perform their official duties objectively and impartially and in the best interest of FPI and its statutory purpose.

Material Financial Interest. A Financial Interest, transaction (or series of transactions viewed in the aggregate) that exceeds \$5,000 in one calendar year is presumed to be Material; however, the SOCO will evaluate each situation on a case-by-case basis in assessing materiality.

Material Percentage. Having five (5) percent of equity in or having the power to vote five (5) percent or more of any class of voting securities with respect to a Reportable Business Entity.

Mineral Interest: Any interest in minerals, oil or gas, including but not limited to, any right derived directly or indirectly from a mineral, oil, or gas lease, deed, or royalty conveyance.

OFI: Other financing institutions which have established an access relationship with FPI under Section 1.7(b)(1)(B) of the Act.

Officer: The salaried chief executive officer, president, vice president, secretary, treasurer, general counsel, chief financial officer, and chief lending Officer of the Farm Credit System Institution, and any person not so designated but who holds a similar position of authority. For purposes of clarity, Officers of FPI include the Chief Executive Officer, President, Vice President, Secretary, Treasurer, Chief Financial Officer, EVP, Human Resources, EVP, Infrastructure and Application Delivery, EVP, and Chief Technology Officer.

Ordinary Course of Business: When applied to a transaction, this term means:

1. A transaction that is usual and customary in the business in question on terms that are not Preferential; or
2. A transaction with a person who is in the business of offering the goods or services that are the subject of the transaction on terms that are not Preferential.

Person: An individual or entity (including sole proprietorships).

Preferential: The transaction is not on the same terms as those prevailing at the same time for comparable transactions for other persons who are not Directors, Employees or Agents of a Farm Credit System Institution.

Reportable Business Entity: An entity in which the reporting individual, directly, or indirectly, or acting through or in concert with one or more persons:

1. Owns a Material Percentage of the equity;
2. Owns, controls, or has the power to vote a Material Percentage of any class of voting securities; or

3. Has the power to exercise a Material influence over the management of policies of such entity from their status as a partner, director, officer, or majority shareholder in the entity.

Resolved: An actual or apparent Conflict of Interest is “resolved” when it has been addressed with an action such as recusal, divestiture, approval or exception, job reassignment, employee supervision, employment separation or other action, with the result that a reasonable person with knowledge of the relevant facts would conclude that the conflicting interest is unlikely to adversely affect the person's performance of official duties in an objective and impartial manner and in furtherance of the interests and statutory purposes of the Farm Credit System.

Standards of Conduct Official or “SOCO”: A person appointed by FPI’s Board pursuant to this Policy to administer and report on FPI’s Standard of Conduct Program as well as investigate allegations of misconduct by FPI’s Directors, Officers, Employees, or Agents.

Standards of Conduct Program Or “SOC Program”: The policies and procedures, including this Policy, internal controls and other actions FPI has implemented to put into practice the requirements of FCA SOC regulations.

Supervised Institution: A term which only applies within the context of a Farm Credit Bank or an employee of a System bank and refers to each association supervised by that Farm Credit bank.

Supervising Institution: A term that only applies within the context of an association or an employee of an association and refers to the Farm Credit bank which supervises that association. *For example*, the Supervising Institution of FPI’s Farm Credit customer, Farm Credit East, ACA, PCA, FLCA is CoBank, ACB.

System Institution or Institution: Any Farm Credit System Bank, association or service organization chartered under Section 4.25 of the Act, and the Funding Corporation. It does not include the Federal Agricultural Mortgage Corporation.

Third-Party Service Provider: Any person or entity that has entered into a business arrangement with FPI, by contract or otherwise, that could have a Conflict of Interest impacting their ability to impartially perform services in the best interests of FPI. This term may include a company with access to confidential or sensitive information or who has an ongoing relationship with FPI. Examples of Third-Party Service Providers includes Agents, independent contractors providing outsourced services, information technology service providers, real estate appraisers, attorneys, and accountants. Customers, utility companies, and companies that sell a license to use software are generally not considered Third-Party Service Providers.

Transacts Business: The purchase, sale, lease, ownership, or management of real or personal property, or the provision of services, such as a real estate agent/broker, the sale or placement of insurance, sales barn activities, and appraisal services; the borrowing or lending of money or other things of value; providing or receiving financial, professional, or other services; and any other similar transaction. “Transacts business” does not include loans by a Farm Credit System institution to a family-owned entity or a reportable business entity; service on the board of directors of the Federal Agricultural Mortgage Corporation; transactions with non-profit entities; or transactions with entities in which the System Institution has an ownership interest.

II. Code of Ethics

The Board has adopted a Code of Ethics, which is available to all Directors, Officers, Employees, Agents, Third-Party Service Providers, and shareholders on FPI’s public facing website located at

www.financialpartners.com, in ServiceNow with all FPI's policies, procedures and standards and available upon request to the SOCO. Directors, Officers, and Employees, and Agents will be required to adhere to the Code of Ethics and any other applicable SOC policies or procedures.

III. Ethics Reporting and Hotline Policy

1. The Board has adopted Reporting of Financial and Other Irregularities Policy and Standard (*also known as* the Whistleblower Policy) authorizing the formation of FPI's Whistleblower Hotline, a third-party hotline established to receive confidential, anonymous complaints from Employees, Officers Directors, Agents or others relating to any violation of law, the Code of Ethics, FPI's Standards of Conduct Policy, or allegation of fraud, corruption, or operational weakness. of FPI's Whistleblower Hotline may be reached by one of the following methods:
 - a. By calling (844) 870-4889; *or*
 - b. Submitting an online report via: <https://financialpartners.tnwreports.com/>
2. FPI takes all reports of misconduct seriously and expects and relies on Directors, Officers, and Employees to identify potential ethical violations. Any retaliation, discrimination, or harassment is strictly prohibited against an individual who reports suspected or actual wrongdoing in good faith or who participates in good faith in a related investigation. Any Director, Officer, or Employee who has been determined to have retaliated against, discriminated or harassed a Director, Officer, Employee, Agent, or Third-Party Service Provider for making a good faith complaint or participating in an investigation in good faith is subject to disciplinary action, up to and including termination.

IV. Conflicts of Interest

1. **Identifying Conflicts of Interest.** All Directors, Officers, and Employees are expected to exercise vigilance in identifying actual and potential Conflicts of Interest, as defined herein.
2. **Avoiding Conflicts of Interest.** This Policy cannot address every potential Conflict of Interest. Directors, Officers, and Employees are encouraged to use their conscience and common sense. In any potential Conflict of Interest situation, all Directors, Officers, and Employees should ask themselves the following:
 - a. Could my personal interests interfere with those of FPI?
 - b. Might it appear that way to others, either inside or outside of FPI, that my ability to perform my official duties to FPI impartially and objectively is impacted by a relationship or interest of mine, my Family, or an entity with which I am affiliated?

Note: If there is uncertainty or the answer is yes to any of above questions, the individual should disclose the interest or relationship and seek guidance from the SOCO.

3. **Transactions or Relationships.** The following are a few examples of activities and relationships that are likely to create a potential or real Conflict of Interest:
 - a. **Nepotism and Personal Relationships.** As outlined in FPI's Nepotism Policy, certain reportable and restricted activities may extend to a Director's, Officer's, or Employee's Family relationships. Ensure that the relationship does not interfere, or appear to interfere, with the Director's, Officer's, or Employee's ability to act in the best interests of FPI or pose any appearance of a Conflict of Interest. Absent prior approval from the SOCO, which

will only be granted in exceptional circumstances, Employees, Officers, and Directors should not transact any FPI business with a Family member.

- b. **Other Personal Relationships.** Directors, Officers, and Employees may have close friends who are employed by or conduct business with FPI, FPI's Farm Credit customers or the Farm Credit Banks of FPI's Farm Credit customers (*e.g.* CoBank or AgriBank). If the Employee, Officer, or Director deals with such a borrower, loan applicant, agent, or other Third-Party Service Provider, care should be taken to ensure that the friendship does not affect, or appear to affect, the Employee's, Officer's or Director's ability to act in the best interests of FPI.
 - c. **Gifts, Meals, and Entertainment.** In some circumstances, the solicitation or acceptance of gifts, meals, or entertainment will constitute a real or apparent Conflict of Interest and are generally prohibited unless an exception applies. Employees, Officers, and Directors should follow the guidance in the "Gifts or Favors" section of this Policy.
4. **Ordinary Course of Business.** A transaction occurs in the Ordinary Course of Business, as defined in this Policy above, when it is either (1) usual or customary in the business in question or (2) with a person who is in the business of offering the goods or services that are the subject of the transaction. Examples of transactions in the Ordinary Course of Business include the following:
- a. *Example One:* The consultant engaged by the executive team to refresh and implement the FPI's growth strategies discovers that one of FPI's Directors is a partner in the CPA firm that has prepared her personal taxes for the last five years. The firm charges the consultant standard, posted for tax planning and preparation services and is in the business of offering accounting services. The consultant and Director have never engaged in the course of her work with the CPA firm or her work for FPI.
 - b. *Example two:* Director raises cattle and contracts with a nearby farm, owned by a borrower, to bale hay for the Director. The Director pays \$20 per bale which is the standard fee charged by the borrower.

V. Directors, Officers, and Employees—Affirmative and Prohibited Conduct

1. **Requirements for Employees, Officers, and Directors.** Each Director, Officer, and Employee shall:
 - a. Comply with the Code of Ethics;
 - b. Maintain high ethical standards, including high standards of care, honesty, integrity, and fairness;
 - c. Act in the best interests of FPI;
 - d. Preserve the reputation of FPI and the public's confidence in the Farm Credit system;
 - e. Exercise diligence and good business judgment in carrying out official duties and responsibilities;
 - f. Identify and disclose to the SOCO Conflicts of Interest and circumstances or transactions that may have the appearance of creating a Conflict of Interest involving the Employee,

Officer, or Director, the Employee's, Officer's, or Director's Family, the Employee's, Officer's, or Director's Reportable Business Entity;

- g. Work with the SOCO to identify conflicts and resolve reported Conflicts of Interest and appearances of Conflicts of Interest;
 - h. Refrain from participating in official action or board discussion of a matter, transaction or activity if the Employee, Officer, or Director has a Conflict of Interest in a matter, transaction, or activity, and avoid voting on or influencing any decision directed at such a matter, transaction, or activity;
 - i. 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;
 - j. Timely report to the SOCO, or through the anonymous reporting procedures, any known or suspected activity by a person affiliated with FPI that the Employee, Officer, or Director suspects is illegal, unethical, or a violation of FPI's Standards of Conduct Policy and Code of Ethics; and
 - k. Fulfill applicable fiduciary duties to FPI and its stockholders.
2. **Prohibited Conduct for Employees, Officers, and Directors** (§612.2150). Directors and Employees must not act inconsistently with the Standards of Conduct core principles. Directors and Employees are prohibited (directly or indirectly) from engaging in Conflicts of Interest which include certain acts, relationships, transactions, or activities set forth below which are deemed to be Conflicts of interest.
- a. Self-Dealing and Favoritism. No Director or Employee shall
 - 1. Participate, directly or indirectly, in deliberations on, or the determination of, any matter affecting, directly or indirectly, their Financial Interest, except those matters of general applicability that affect all stockholders/borrowers in a nondiscriminatory way;
 - Note: Matters affecting Financial Interests include Financial Interests of Family or any Reportable Business Entity.
 - 2. Use their position to obtain or attempt to obtain special advantage or favoritism for the Employee or Director, any Family of the Director, Officer, or Employee, or any Reportable Business Entity.
 - b. Gifts, Fees, Compensation – Influencing Action. A Director or Employee shall not solicit, obtain, or accept, directly or indirectly, any gift, fee or other compensation that is offered or requested based on the person's position as a Director, Officer, or Employee of FPI if it could be viewed as being offered to influence their decision-making, an official action, or to obtain information related to FPI's operations (*See* "Gifts or Favors" provision below).
 - c. Divulge or make use of, except in the performance of official duties, any fact, information, Farm Credit customer information, or document not generally available to the public that is acquired by virtue of the Employee's, Officer's, or Director's position with FPI or otherwise violate any policies or procedures of FPI pertaining to protecting confidential information.
 - d. Purchase Property Owned by FPI. A Director or Employee shall not knowingly purchase or otherwise acquire, directly or indirectly, any interest (including mineral interests) in any real or personal property that currently is owned, or within the past 12 months was owned by FPI or FPI's Farm Credit customers or their lending District Banks (e.g. CoBank or AgriBank) as a result of foreclosure, deed in lieu, or similar action, unless:

1. The Employee, Officer, or Director acquires the property by inheritance;
2. The Employee, Officer, or Director acquires the property by exercising their right of first refusal; or
3. The Director acquires the property through public auction or open competitive bidding available to the general public; provided, however, the Director shall not acquire any such interest in real or personal property if the Director participated in the deliberations or decision to foreclose or to dispose of the property or in establishing the terms of the sale;

Note: This prohibition extends to property held or sold by a 4.25 service corporation or a System unincorporated business entity.

- e. Enter into Transactions with Prohibited Sources. A Director or Employee shall not, directly or indirectly borrow from, lend to, or become financially obligated with or on behalf of a Director, Officer, Employee, or Agent of FPI or a borrower or loan applicant of the FPI, unless:
 1. The transaction is with a Family member;
 2. The transaction is in the Ordinary Course of Business as determined by the SOCO under this Policy.
 3. The transaction is undertaken in an official capacity and in connection with the FPI's discounting, lending, or participating relationships with OFIs and other lenders.
- f. Violate the FPI's policies and procedures governing Standards of Conduct or Code of Ethics.
- g. Enter into any transaction with FPI, directly or indirectly, unless the SOCO has reviewed the proposed transaction and its terms and made a written determination approving the transaction as being in conformity with this SOC Policy.
- h. Purchase System Obligations. Directors and Employees shall not purchase any obligation of a Farm Credit System Institution, including any joint, consolidated or System-wide obligation, unless such obligation is part of an offering available to the public and the Employee, Officer, or Director either purchases it through a dealer or a dealer bank affiliated with a member of the selling group designated by the Funding Corporation or purchases it in the secondary markets. Additionally, Directors, Officers, and Employees should be mindful of the following prohibitions:
 1. Do not purchase or retire any stock in advance of the release of Material non-public information concerning a System Institution to other stockholders.
 2. If you are a director or employee of the Funding Corporation, do not purchase or otherwise acquire, directly or indirectly, except by inheritance, any obligation or equity of a Farm Credit System Institution, including any joint, consolidated or System-wide obligations, unless it is a common cooperative equity as defined in § 628.2 of the FCA regulations.
- i. Use the space, personal property, intellectual property, personnel, software, or equipment or other facilities of FPI for activities or business in such person's personal interest or the personal interest of another without prior authorization from the Chief Executive Officer or the SOCO. Infrequent, *de minimis* use of FPI's equipment, space or personal property

for personal use, such as infrequent printing, use of a work computer for a personal virtual meeting, or use of mailing and shipping options, is permissible. Any expenses incurred for personal use, such as postage and shipping fees, should be promptly reimbursed, and such activities should not interfere with an employee's job responsibilities

3. **Prohibited Conduct for Officers and Employees Only.** An Officer or Employee shall not:

- a. Serve as a director or employee of any commercial bank, savings and loan, or other non-System financial institution;
- b. Serve as a director or employee of a non-System entity that Transacts Business with a System Institution within the CoBank district unless the following exceptions apply:
 1. The Employee or Officer may serve as a director or employee of employee credit unions; and
 2. The Employee or Officer may serve as a director of a cooperative that borrows from the System under the Act's Title III authorities if the Officer or Employee meets the requirements of § 612.2150(b)(1)(ii).

Note: For purposes of this paragraph, "Transacts Business" does *not* include loans by a System Institution to a Family-owned entity or a Reportable Business Entity; service on the board of directors of the Federal Agricultural Mortgage Corporation; transactions with nonprofit entities; or transactions with entities in which the System Institution has an ownership interest.

- c. Act as a real estate agent or broker unless the Officer or Employee is buying or selling real estate for their own use or for Family;
- d. Act as an insurance agent or broker for the sale and placement of insurance, unless authorized by § 4.29 of the Act; and

4. **Protection of Confidential Information and Trade Secrets.**

- a. Directors Officers and Employees shall **not**, at all times while a Director or Employee of FPI and at all times thereafter, directly or indirectly, without the prior consent of FPI, make personal use of, reproduce, copy, disseminate, publish, disclose, divulge, communicate, provide or otherwise make available, intentionally or negligently, to any unauthorized Person or entities any "Confidential Information" or otherwise violate any policies (*including but not limited to*, this SOC Policy and FPI's Information Security Policy), procedures and Non-Disclosure or Confidentiality Agreements of FPI pertaining to the use and protection of confidential information.
- b. "Confidential Information" shall mean all written policies, procedures, plans, designs, programs and technical data; customer accounts and agent lists; borrower information, Personally Identifiable Information/Personal Information as defined by federal and state law ("PII/PI"). Financial, tax and records information; computer software programs and related documentation; copyrights, trade secrets, trademarks, service marks or trade names relating to any processes, procedures or products used by FPI, or its Farm Credit customers, or related to their business or operations; files, manuals, forms or other business materials; flow charts, proposals, marketing and business plans; methods of consulting procedures and innovative techniques; pricing information, policies, formulas, and techniques; any

document marked “Confidential,” any information which the Directors or Employees might reasonably expect to be regarded as “Confidential,” and any information that has been provided in confidence to the Director or Employee by any Person with respect to FPI or its Farm Credit customers; any information (i.e., identity, credit and business requirements, etc.) that has been provided in confidence to the Director or Employee regarding the customers of FPI; and all other tangible or intangible knowledge or information of a confidential nature acquired at or after the date hereof with respect to the business and operations of FPI, all the foregoing which is learned or developed, in whole or in part, by the Director or Employee, or otherwise comes into the Director’s or Employee’s possession, control or knowledge, in connection with, or arising out of, the Director’s service or Employee’s Employment with FPI.

- c. Unauthorized disclosure or use of FPI’s and its Farm Credit customers confidential and trade secret protected information is strictly prohibited. Violations will be subject to disciplinary action including but not limited to termination of employment and/or legal action.

VI. Reporting and Resolution Process

1. **Annual Disclosure.** Annually, as of FPI’s fiscal year-end and at such other times as may be required by the Board or to comply with other disclosure requirements herein, Directors, Officers, and Employees must file a written and signed statement with FPI’s Standard of Conduct Official, which to the best of their knowledge, fully discloses:
 - a. Any interest the Officer, Employee, or Director has in any business matter, including any loan or loan application, to be considered by FPI, FPI’s Farm Credit customers or the customer Farm Credit Banks, CoBank, ACB or AgriBank in the current fiscal year;
 - b. All Material Financial Interests, including those arising in the Ordinary Course of Business, the Employee, Officer, or Director has with any Director, Officer, Employee, Agent, or borrower of FPI, FPI’s Farm Credit;
 - c. FPI Farm Credit customers or the customer Association’s Farm Credit Banks CoBank, ACB or AgriBank;
 - d. The names of any Reportable Business Entity of an Employee, Officer, or Director that the Employee, Officer, or Director knows or has reason to know, in the current fiscal year, transacted business with:
 - i. FPI
 - ii. FPI’s Farm Credit customers or the Farm Credit Banks (*e.g.* Cobank, ACB and AgriBank) of FPI’s Farm credit customers; or
 - iii. A borrower that Transacts Business with FPI’s Farm Credit customers or the Farm Credit Banks (*e.g.* Cobank, ACB and AgriBank) of FPI’s Farm Credit customers;
 - e. The names of the Employee’s, Officer’s, or Director’s Family that the Employee, Officer, or Director knows or has reason to know transacted business with FPI, FPI’s Farm Credit customers or the Farm Credit Banks (*e.g.* CoBank and AgriBank) of FPI’s Farm credit customers at any time during the current fiscal year;

- f. Reportable gifts received or disposed of under this Policy in the current fiscal year;
 - g. Any other known or potential Conflicts of Interest and any other information requested on the disclosure forms;
 - h. If you are a Director or Officer of FPI, at least annually, you must also provide the SOCO with the information required for disclosure under paragraphs (a), (e), and (f) of 12 C.F.R. § 620.6 (disclosures in the Annual Report to Shareholders Relating to Directors and Senior Officers), regardless of whether you have provided these disclosures to others in FPI.
2. **Continuing Obligation to Disclose.** Any Director, Officer, or Employee who becomes or plans to become involved (to the best of their knowledge) in any relationship, transaction, or activity that could constitute a real or perceived Conflict of Interest shall **promptly** report such involvement in writing to FPI's Standard of Conduct Official prior to the undertaking thereof for a determination of whether the relationship, transaction, or activity is, in fact, a Conflict of Interest.
 3. **Loan Transactions with Depository Banks.** The Chief Executive Officer, Chief Financial Officer, and any other Officer or Employee having influence on FPI's transactions with or having authority to transact business with a depository bank used by FPI shall report any borrowing from such entity in excess of \$25,000 in their annual disclosure to the Standards of Conduct Official. This requirement does not include checking, savings, or credit card accounts on terms and conditions available to the general public.
 - a. FPI has a depository relationship with M&T Bank (formerly People's United Bank), Springfield, MA.
 4. **Newly Elected or Appointed Directors.** Unless a disclosure as a Director candidate under Part 620 of the FCA regulations has been made within the **preceding 60 days**, a newly elected or appointed Director shall report matters required to be reported pursuant to this Policy to FPI's Standard of Conduct Official **within 60 days** after the election or appointment and thereafter shall comply with the requirements of this Policy. Upon commencement of a newly elected or appointed Director's term, the Director will be provided with the needed resources, assistance, and materials to complete the Director's SOC disclosures.
 5. **Newly Hired Employees.** A newly hired Officer or Employee shall report matters required in the above paragraphs to the SOCO no later than **10 business days** after starting employment and thereafter shall comply with the disclosure and reporting requirements of this Policy.
 6. **Continued Disclosure Until Cured.** Once a Conflict of Interest or required disclosure is reported, it should be reported annually as long as that relationship, interest, or activity forming the basis of the disclosure exists. The individual reporting the Conflict of Interest may note any ongoing action taken to resolve the Conflict of Interest in making the disclosure.
 7. **Reporting Unethical or Illegal Activity or Violations of this Policy.** All Directors, Officers, and Employees must report, either to the SOCO or by using the FPI's Whistleblower anonymous reporting mechanisms, any known or suspected activity by a person affiliated with FPI that the Director, Officer, or Employee suspects is illegal, unethical, or a violation of this Policy or other SOC policies or procedures, which includes any violation of the Code of Ethics.
 8. **Form and Disclosure.** Disclosures required by this Policy shall be made in writing and shall be promptly submitted to FPI's Standard of Conduct Official and where applicable, by using the applicable disclosure Certification Forms. Employees, Officers, and Directors are also required to timely respond to any additional questions the SOCO may have with respect to the Employee's, Officer's, or Director's disclosures.

9. **Recusal.** In fulfilling their obligations as a Director, Officer, or Employee of FPI, it is a duty of each Director, Officer, or Employee to avoid even the appearance of impropriety, unethical behavior or Conflict of Interest. Accordingly, a Director, Officer, or Employee should not participate in any deliberations, meetings or actions which deal with matters in which the Director, Officer, or Employee may have a Conflict of Interest or the appearance of a Conflict of Interest. In such event, the Director, Officer, or Employee shall recuse themselves from any such deliberations, meetings or actions by providing a written notice of recusal using the Statement of Recusal Form, prior to such meeting, action or deliberation, to the SOCO. The SOCO shall maintain a copy of the notice of recusal within the Conflicts of Interest records maintained by the SOCO.
10. **Review Process.** The SOCO shall review, within a reasonable amount of time, all Employee, Officer, and Director annual and interim disclosures, SOC concerns or allegations raised either to the SOCO or through the anonymous reporting procedure.
- a. The SOCO will review annual and interim disclosures for completeness, accuracy and compliance with SOC Regulations, this Policy. The SOCO will verify that the names of any Family members or Reportable Business Entities who transact business (e.g., loans or financially related services) with FPI, FPI's Farm Credit customers, the Association borrowers, or with the Farm Credit Funding Banks or its borrowers, as disclosed by a Director, Officers or Employee correctly correspond to FPI's internal records.
 - b. The SOCO has authority to investigate SOCO issues as set forth herein, and should external resources, such as attorneys or consultants, be necessary to properly conduct an investigation, the SOCO shall engage such resources as the SOCO determines is necessary and appropriate and may seek approval from the Board in engaging these resources.
 - c. Employees, Officers, Directors and Agents are expected to cooperate in any such investigation and are authorized to provide the SOCO or the SOCO's designee or retained investigator with information requested as part of this review, recognizing the SOCO's existing confidentiality obligations to FPI.
 - d. As a part of this review, the SOCO will determine whether:
 - i. A real or apparent Conflict of Interest exists;
 - ii. Any alleged transactions are conducted in the Ordinary Course of Business or otherwise fall within an exception outlined in this Policy;
 - iii. Any reporting obligations are triggered by the information or report; and
 - iv. Whether further or an external investigation is needed or required by this Policy.
11. **Resolution Process.** Within a reasonable amount of time and following full review and/or investigation of a disclosure or allegation, the SOCO will make a written determination outlining any factual findings and determination for resolving the Conflict of Interest. (See Resolved definition.) These resolutions may include, but are not limited to recusal, approval or exception, divestiture, job reassignment, employee supervision, and/or Employee, Officer, or Director separation.
- a. **Recusal.** In the event that after reviewing the disclosure and Statement of Recusal Form, the SOCO determines there is in fact an actual, potential or perceived Conflict of Interest, the SOCO will communicate in writing the Employee's, Officer's, or Director's continued obligation to recuse themselves from the transaction or activity creating a conflict as well as any additional parameters with respect to the transaction or activity. Similarly, in the event the SOCO determines there is no Conflict of Interest or that the Conflict of Interest may be resolved by means other than recusal, the SOCO, may, in writing, authorize the Director, Officer, or Employee to fully participate in all Board or employment activities,

communicating any other parameters with respect to the transaction or activity.

- b. **Approval or Exception.** If the SOCO approves some or all of the Employee's, Officer's or Director's disclosed transactions and/or activities, the SOCO will inform the Employee, Officer, or Director in writing of such determination and any conditions of approval (such as recusal). The SOCO will similarly document such action.
- c. **Other Corrective Action.** When the SOCO recommends corrective action to resolve a Conflict of Interest, the SOCO must prepare a written determination explaining the SOCO's analysis and submit it for implementation to the individual with authority to implement the determination.
 - i. The Chief Executive Officer, Human Resources or the CEO's designee is authorized to implement the SOCO's determination and resolution with respect to Employees and Agents of FPI reporting to management and to take other corrective actions deemed necessary and appropriate, with SOCO approval, to resolve the Conflict of Interest.
 - ii. The Board will implement the SOCO's determination and resolution with regard to Directors, Agents of the Board, and the CEO, taking any other corrective actions deemed necessary in accordance with the Bylaws and governing documents, in consultation with the SOCO.
 - iii. The actions taken in this section include, but are not limited to, divestiture, job reassignment, disciplinary action (verbal or written reprimand, suspension, probation, termination), removal, and/or stockholder disclosure. Any such corrective actions shall be documented in writing by the SOCO, who will provide reasonable detail to the Employee, Officer, or Director on the issues raised and actions taken.
- d. **Appeal Procedures.** Decisions made by the Standards of Conduct Official (or the Board if the decision pertains to the Standards of Conduct Official or the CEO) pursuant to this Policy or Regulations, may be appealed by the affected Employee.
 - i. Any Employee or Director planning to make such an appeal must notify the SOCO in writing of their intent to appeal the denial within ten (10) business days of the SOCO's determination. The notice of intent to appeal must specify in writing the circumstances surrounding the SOCO's decision and all grounds for appeal.
 - ii. Upon receipt of a notice of appeal, the SOCO shall respond in writing to such Employee or Director within five (5) business days of the notice date confirming receipt and providing any clarification or revisions to the SOCO's decision. The Employee or Director will have five (5) business days to withdraw the appeal upon receipt of the SOCO response.
 - iii. Absent a withdrawal of the notice of intent to appeal by the deadline, the SOCO shall transmit the appeal, and all relevant documentation, to the chairperson of the Board for consideration by the Board (in the case of an appeal by a Director or the CEO) or to the Chief Executive Officer (in the case of an appeal by an Employee other than the CEO). Any affected Director (or the CEO, if applicable) shall not participate in or influence Board deliberations on such matter.
 - iv. The decision of the Board or CEO shall be final, and the decision will be promptly communicated to the appealing Employee or Director in writing. All

documentation of an appeal, along with the reasons for a decision by the Board, shall be maintained by the SOCO as set forth herein.

VII. Termination of Prohibited Transactions, Activities and Relationships

1. **Grace Period for Existing Directors and Employees.** A Director, Officer, or Employee who entered a relationship, transaction or activity, which at the time was allowed but is now prohibited by this Policy, or who otherwise discovers and discloses a relationship, transaction or activity prohibited by this Policy, shall have a reasonable time to terminate the relationship, transaction or activity. The Director, Officer, or Employee shall request in writing from the SOCO an allowance of time to terminate the relationship, transaction or activity. The prohibited relationship, transaction or activity shall be terminated as quickly as possible. The time granted shall normally be no more than ninety (90) days from the date the disclosure is made. If the Director, Officer, or Employee reasonably believes that they will require a longer time period to terminate the transactions, relationships or activities prohibited by this Policy, the Director, Officer, or Employee may submit a written request to the SOCO for a longer time period, which the SOCO may provide in consultation with the Board.
2. **Grace Period for New Directors and Employees.** A newly elected or appointed Director or newly hired Officer or Employee who is involved at the time of election, appointment, or hiring in transactions, relationships or activities prohibited by this Policy or shall have generally ninety (90) days from the Director's, Officer's, or Employee's start date to terminate such transactions, relationships or activities. If the Director, Officer, or Employee reasonably believes that they will require a longer time period to terminate the transactions, relationships or activities prohibited by this Policy, the Director, Officer, or Employee may submit a written request to the SOCO for a longer time period which the SOCO may provide in consultation with the Board.

VIII. Standards of Conduct Official

1. **Designation.** The Board shall designate a Standards of Conduct Official for FPI. The SOCO may be an Officer of FPI, a 4.25 chartered service corporation, or a qualified outside person contracted by FPI to serve as the SOCO. The SOCO may, with the advice and consent of the Board, designate an Employee within FPI to act as the SOCO Designee/SOCO Liaison and to assist the SOCO, under the SOCO's supervision, with any of the SOCO's authorities and responsibilities as provided herein.
2. **Authority.** The SOCO will be empowered with all of the following:
 - a. Direct access to the Board for the purpose of discussing and reporting on matters related to FPI's SOC Program.
 - b. Authority to carry out the responsibilities set forth in this Policy.
 - c. Accessibility to all Directors, Officers, Employees, and Agents of FPI for the purpose of carrying out their responsibilities;
 - d. Legal authority to receive confidential SOC program communications from all Directors, Officers, Employees, and Agents of FPI; and
 - e. Resources adequate for implementing a successful SOC program.
3. **Responsibilities.** The SOCO shall, in addition to any other authorities and responsibilities assigned by the Board:

- a. Monitor FCA SOC regulations and related guidance in implementing and overseeing the SOC program;
 - b. Provide guidance and information to Directors, Officers, Employees, and Agents concerning the provisions of the SOC program and Code of Ethics;
 - c. Receive and review disclosures and reports required hereunder from Directors, Officers, Employees, and Agents;
 - e. Receive from Directors and Officers the disclosures required under § 620.6(a), (e), and (f) of the FCA regulations for treatment as a supplement to an individual's other SOC disclosures and reports; Create Reports: For purposes of surfacing potential recusal situations, the SOCO will prepare and maintain records of: 1) the names and relationships of Director Family members and Reportable Business Entities for Board use (“**Director-Related Parties Report**”) and 2) the names and relationships of Employee Family members and Reportable Business Entities for senior management and Information Security's use (“**Employee-Related Parties Report**”). These records may be combined with other similar FPI insider records and reports prepared and used for such purposes nepotism tracking for security controls and for the annual report to shareholders
 - f. Review any disclosures or reports made by any Agents or Third-Party Service Providers and coordinate with Vendor Management in maintaining a current list of third-party service providers and agents for providing updated SOC guidance and reminders;
 - g. Review and act upon all SOC program reports and disclosures, including documenting resolved and unresolved Conflicts of Interest and any other SOC determinations as outlined in this Policy;
 - h. Maintain all SOC program records for a period of no less than **six (6) years**, including documentation that explains how conflicts are being handled;
 - i. Provide training for all Directors, Officers, and Employees, as outlined below;
 - j. Conduct investigations, as authorized by this Policy;
 - k. Report to the Board those SOC or Code of Ethics issues as required in this Policy.
 - l. Report promptly to the Board and as applicable the Office of General Counsel, Farm Credit Administration all cases investigated required by 12 C.F.R. § 612.2170(d)(2) FPI's Criminal Referrals Policy and Procedure.
4. **Duty to Investigate.** The SOCO shall investigate or cause to be investigated all cases involving:
- a. Possible violations of criminal statutes;
 - b. Possible violations of this Policy and any related procedures;
 - c. Possible prohibited conduct by a Director, Officer, or Employee pursuant to this Policy;
 - d. Complaints of misconduct received against Directors, Officers, and Employees; and
 - e. Actions, transactions, relationships, or events when the activities or suspected activities are of a sensitive nature and could affect continued public confidence in the Farm Credit System.
5. **Director and Employee Training.**
- a. **New Directors.** Newly elected or appointed Directors must receive standards of conduct training within **60 calendar days** of the Director **assuming their position**.
 - b. **New Employees.** New Officers and Employees must receive standards of conduct

training within **10 business days of beginning work**.

- c. **Periodic Training.** At least annually, the SOCO shall conduct training for all Directors, Officers, and Employees, which will include, at a minimum, updates to the SOC Program and Code of Ethics, Criminal Referral policy and procedure training, and the Reporting of Financial and Other Irregularities Policy (“Whistleblower policy”).
 - d. **Written Certification.** The SOCO must obtain written or electronic training participation certifications from every Director, Officer, and Employee and maintain those records in line with this Policy and the SOC regulations.
6. **SOCO Training.** Annually, or on a more frequent basis if required by the Board, the SOCO shall complete not less than three (3) hours of continuing education and training to enhance the abilities of the SOCO in carrying out the SOCO's authorities and responsibilities as provided under this Policy. Such training may include, but is not limited to, training offered by Farm Credit Associations, Farm Credit Banks, the Farm Credit Administration or other qualified sources to be approved by the Board.
7. **SOCO Reporting.** In addition to any other reporting requirements of the SOCO as set forth under this Policy, the SOCO shall report to the Board as follows:
 - a. At least quarterly, report on any Material Conflict of Interest determination. For this section, a Material Conflict of Interest determination means any case the SOCO has a duty to investigate and/or disclose to the Board under 12 C.F.R. § 612.2170(d) and this Policy.
 - b. The SOCO shall present to the Board on an annual basis, or on a more frequent basis if required by the Board, a summary report on Material Conflicts of Interest and Code of Ethics matters or SOC violations for the previous twelve (12) months. The summary report shall, at minimum, (a) summarize the SOCO's review of all annual disclosures required from Employees, Officers, and Directors, (b) specifically describe any Material Conflicts of Interest and their resolution, (c) summarize the standards of conduct training provided to Employees, Officers, and Directors over the prior 12 months.
8. **SOCO Conflict of Interest Disclosure.** The SOCO shall submit in writing and present a Conflicts of Interest disclosure to the Board for approval as of FPI's fiscal year end. In the event that any pending Conflicts of Interest matters arising under this Policy involve the SOCO, such matters shall be referred to, investigated by and approved or resolved by the Board.

IX. Employee Devotion of Time to Official Duties

1. Employees of FPI are required to devote the full business time for which they are employed to the effective accomplishment of the duties assigned to them. They shall not accept outside employment or compensation or engage in any other activities that could require the use of their work time that should be devoted to official duties. The President/CEO may, however, grant employees limited administrative leave to participate in civic or community activities consistent with maintaining good corporate citizenship in the community.

X. Employee Political Activity

1. No Officer or Employee of FPI shall hold a public office or be a candidate for such office unless the SOCO has, after investigation and consideration of all facts involved, determined in writing to the Board that such candidacy or holding of public office would not bring justified criticism on the grounds of political activities or partialities or in any manner adversely affect the best interests of

the borrowers or the operations and public image of FPI, FPI's Farm Credit customers or Farm Credit System or impair the ability of the Officer or Employee to meet the requirements contained in this Policy of devotion of time to official duties. All determinations made hereunder shall be made by the SOCO.

2. No Officer or Employee shall take an active part or issue public statements relating to the nomination or candidacy of any person or participate in partisan political campaigns for national or statewide elective office, in any way that would implicate by support, endorsement, or otherwise, the Officer's or Employee's connection with FPI. This statement shall not be construed to prohibit an Officer or Employee from expressing the Officer's or Employee's personal opinion on political affairs or candidates or making voluntary campaign contributions.
3. FPI employees are prohibited from engaging in political activities in a manner that involves the System, unless such activities are required or requested as part of their official duties on behalf of FPI.
4. An FPI employee whose political activity is approved must refrain from purporting to represent FPI, FPI's Farm Credit customers or any Farm Credit System Institution in such activities. Employee involvement in political activities shall not adversely affect the best interests of FPI, FPI's Farm Credit customers and the Farm Credit System.

XI. Nepotism

To enable management to make an impartial and objective view of its operations and to avoid the appearance of giving special advantage or favoritism in the hiring or promotion of Officers and Employees of FPI, the following restrictions shall be observed:

1. A Family member of a Director of FPI may not serve as an Officer of FPI.
2. A person may not serve as an Officer, Employee, or Agent of FPI in a position that is under the direct supervision of a Family member or where the Family member has authority within FPI to take administrative or other action directly affecting the Officer, Employee, or Agent.
3. In addition to the foregoing, FPI will not hire or engage as an Employee or Agent a Family member of any Director, Officer or Employee of FPI absent an exception granted in unique circumstances with approval the Chief Executive Officer and the Standards of Conduct Official, who must resolve any potential Conflict of Interest and assess the business need justifying the exception.
4. In addition to the foregoing, when any two Employees become Family as defined in this Policy, one of the Employees (as determined between them) must leave employment with FPI absent an exception being granted as set forth in the subsection above. Any such departure shall be within a reasonable period of time as determined in the sole discretion FPI.

XII. Gifts or Favors

1. **Guidance on Gifts.** Directors, Officers, and Employees should not ask for or accept gifts, entertainment, educational opportunities, or any other favor if doing so might compromise, or appear to compromise their ability to make objective business decisions in the best interest of FPI or that may be viewed as intended to influence official action or decisions.
2. **Intra-System Prohibition.** Unless otherwise provided herein, no Director, Officer, or Employee of FPI shall ask for, give or receive any gift or present from or to any Director, Officer, or Employee of FPI, FPI's Farm Credit customers or Farm Credit Banks.

3. **Customer Prohibition.** Unless otherwise provided herein, no Director, Officer, or Employee of FPI shall at any time ask for or accept any gift or present from any borrower or loan applicant, for themselves or another Director, Officer, or Employee of a Farm Credit System Institution.
4. **Exception for De Minimis Value Gifts.** The prohibition on gifts under this Policy shall not apply to gifts valued at less than \$150 individually or \$300 in aggregate from one person in a given year that are exchanged as a part of acceptable social traditions.
5. **Exception for Non-Business Events.** A Director, Officer, or Employee may solicit, give or receive a present otherwise prohibited under this section, provided the gift could not be viewed by a reasonable person as attempting to influence official FPI business, in the following circumstances:
 - a. A gift exchanged at a non-business, personal event outside of and unrelated to the FPI's business, between two individuals whose relationship with one another is based on a connection outside of FPI's business; *or*
 - b. A gift offered, solicited, given or received by Family of the Director, Officer, or Employee.
6. **Exception for Customary Business or Social Gifts.** Directors, Officers, or Employees may accept or provide educational opportunities or entertainment (including, but not limited to, meals, sporting events, conference registration fees, lodging, transportation, and tickets) so long as (a) it is an event at which the giver is present and such event affords an opportunity to discuss business and/or develop business relationships and (b) the event or gift complies with Section XII-1 (Guidance on Gifts). Directors, Officers, and Employees may also accept, contribute to, or provide gifts made to other Directors, Officers, or Employees which are customary or social, such as wedding, baby, retirement, or sympathy gifts or contributions to a memorial fund, on behalf of FPI or a group of Directors, Officers, and Employees. Authorized entertainment, meals, educational opportunities, branded promotional gifts related to transactions or events, and travel expenses incurred by Officers and Employees with respect to current or potential customers or referral sources to support the legitimate business interests of FPI for business development purposes are not considered Gifts under this Policy.
7. **Reportable Gifts.** An Employee, Officer, or Director must promptly report any gift, tangible or intangible, received accepted, in excess of the De Minimis Value of gifts and does not fall under the non-business exception or customary business or social gift exceptions listed above. Such a disclosure can be made using the Director, Officer, or Employee Standards of Conduct and Code of Ethics Certification forms.
8. **Disposing of Impermissible Gifts.** Unless a gift received by an Employee, Officer, or Director is subject to one of the exceptions listed above, an Employee, Officer, or Director who receives an impermissible gift must dispose of the gift in accordance with the procedures set forth below. The obligation to dispose of a gift that cannot be accepted under this Policy is independent of FPI's decision regarding corrective or disciplinary action.
 - a. **Gifts of tangible items.** The Employee, Officer, or Director must promptly return any tangible item to the donor or pay the donor its market value. An Employee, Officer, or Director who cannot ascertain the actual market value of an item may estimate its market value by reference to the retail cost of similar items of like quality.
 - b. **Gifts of Perishable Items.** When it is not practical to return a perishable item, the

Employee, Officer, or Director may, at the discretion of the SOCO, give the item to an appropriate charity, share the item with the recipient's office, or destroy the item.

- c. **Gifts of Intangible Items.** The Employee, Officer, or Director must promptly reimburse the donor the market value for any entertainment, favor, service, benefit, or other intangible. Subsequent reciprocation by the Employee, Officer, or Director does not constitute reimbursement.

XIII. Agents and Third-Party Relationships

1. **Business Practices; Administration and Corrective Action.** To avoid misconduct and Conflicts of Interest, either real or apparent, by Third-Party Service Providers, FPI utilizes safe and sound business practices in the engagement, utilization, and retention of qualified and reputable Agents. FPI shall take appropriate investigative and corrective action in the case of a breach of fiduciary duties by the Agent or failure of the Agent to carry out other agent duties as required by contract, policy, procedure, FCA regulations, or law.
2. **Policy for Agents.** FPI has adopted a separate Standards of Conduct Policy for Agents which will be distributed to all Agents of FPI.
3. **Third-Party Service Providers.** Upon engagement, FPI will make the Code of Ethics available to all Third-Party Service Providers, including any Agents. Third-Party Service Providers are expected to comply with the Code of Ethics and to disclose any known Conflicts of Interest to the SOCO.

XIV. Audit Monitoring & Review Requirements

1. **Periodic Reviews.** The SOCO will conduct scheduled periodic reviews of its SOC Program, including this Policy and the SOC Policy, to determine the continued adequacy of the program. Each review will assess consistency with FPI's practices, financial service industry best practices and FCA regulations, identifying any required updates.
2. **Internal Audits.** FPI will also from time to time conduct internal audits of the SOC Program, which will be designed to review the effectiveness of advancing this SOC Policy, identifying weaknesses, recommending and reporting necessary corrective actions, and cover the entire SOC Program across FPI.

XV. Additional Resources

1. FCA Regulations:
 - a. [FCA Regulation 611.310](#) – Eligibility for Membership on Bank and Association Boards and Subsequent Employment
 - b. [FCA Regulation 611.320](#) – Impartiality in the Election of Directors
 - c. [FCA Regulation 612.2130](#) – Definitions
 - d. [FCA Regulation 612.2135](#) – Director and Employee Responsibilities and Conduct
 - e. [FCA Regulation 612.2140](#) – Directors: Prohibited Conduct
 - f. [FCA Regulation 612.2145](#) – Director Reporting
 - g. [FCA Regulation 612.2150](#) – Employees: Prohibited Conduct
 - h. [FCA Regulation 612.2155](#) – Employee Reporting
 - i. [FCA Regulation 612.2157](#) – Joint Employees
 - j. [FCA Regulation 612.2160](#) – Institution Responsibilities
 - k. [FCA Regulation 612.2165](#) – Policies and Procedures
 - l. [FCA Regulation 612.2170](#) – Standards of Conduct Official

- m. [FCA Regulation 612.2260](#) – Standards of Conduct for Agents
 - n. [FCA Regulation 612.2270](#) – Purchase of System Obligations
 - o. [FCA Regulation 620.05](#) – Contents of the Annual Report to Shareholders
 - p. [FCA Regulation 620.06](#) – Disclosures in the Annual Report to Shareholders Relating to Directors and Sr. Officers
2. FPI Referenced Policies and Procedures: *All Policies and Procedures are located in ServiceNow*
- a. Code Of Ethics
 - b. Criminal Violations Referral Policy
 - c. Criminal Violations Referral Procedure
 - d. Fraud Risk Management
 - e. Reporting of Financial and Other Irregularities Policy and Standard (*also known as the “Whistleblower Policy”*)
 - f. Information Security Policy
 - g. Standard of Conduct Policy for Agents