

Farm Credit Financial Partners, Inc.'s CODE OF ETHICS

I. Overview

Farm Credit Financial Partners, Inc., (“FPI”) 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 FPI and its Directors, Officers, Employees, Agents and Third Party Service Providers.¹

II. Objective

FPI is committed to conducting business in accordance with the highest ethical standards as set forth in the Standards of Conduct Policy and Procedure. Moreover, FPI 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 Farm Credit Administration (“FCA”) for use in preparing the Farm Credit system financial statements and related disclosures.

Accordingly, FPI expects all of its Directors, Officers, Employees, Agents and Third Party Service Providers 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 Procedure and other policies and procedures adopted by FPI that govern the conduct of its employees and agents. To achieve these high ethical standards, all Directors, Officers, Employees, Agents and Third Party Service Providers should, among other things, avoid conflicts of interests.

This Code is intended to supplement FPI’s Standards of Conduct Policy.

III. Requirements

- a. All Directors, Officers, Employees, Agents and Third Party Service Providers.** All Directors, Officers, Employees, Agents and Third Party Service Providers are required to:
1. Maintain high ethical standards, including high standards of honesty, integrity, and fairness, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
 2. Act in the best interests of FPI and its Farm Credit customers.
 3. Preserve the reputation of FPI and the public’s confidence in the Farm Credit System.
 4. Exercise diligence and good business judgement in carrying out official duties and responsibilities.

¹ The Code is intended to comply with FCA Regulation Part 612, Subpart A, including 12 C.F.R. § of 612.2137(c), and terms used herein are defined in 12 C.F.R. § 612.2130.

5. Identify and disclose to the Standards of Conduct Official or CEO any conflicts of interest and/or circumstances or transactions that reasonably could be expected to give rise to a conflict or have the appearance of creating a Conflict of Interest.²
6. Refrain from participating in official action or discussion on any matter if the Director, Officer Employee, or Agent has 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 FPI 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 FPI's anonymous reporting mechanisms.
 - a. **Anonymous Reporting** can be made by using FPI's **Whistleblower Hotline or Ethics Point reporting site**;
 - *phone* at (844) 870-4889; *or*
 - FPI's dedicated website at <https://financialpartners.tnwreports.com/>
11. Take all reasonable measures to protect the confidentiality of non-public information about FPI 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 FPI financial statements and related financial reports or communications as well as reports and documents filed with or submitted to the Farm Credit Administration. Directors and Officers are explicitly prohibited from taking any action to fraudulently, coerce, manipulate, or mislead FPI's independent public accountant for the purposes of rendering FPI's financial statements misleading.

IV. Policy Compliance

Each Director, Officer, Employee, Agent and Third Party Service Provider is responsible for reading and understanding this policy and conducting their activities and business transactions accordingly.

FPI 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. In agreeing to this Code of Ethics, you understand you are prohibited from directly or indirectly taking any action to fraudulently influence, coerce, manipulate or

² Agents subject to this policy are required to disclose known conflicts of interest, consistent with the Standards of Conduct Policy for Agents.

mislead FPI's independent public accountant for the purpose of rendering the financial statements of FPI misleading. Further, your actions at all times shall be constructive to the process of generating timely and accurate financial reporting.

Any exception to this procedure must be submitted to and approved by FPI's Standards of Conduct Official ("SOCO").

V. Violations of the Code of Ethics

All Director, Officer, Employee, Agent and Third Party Service Providers will be held accountable for adherence to this Code. A failure to observe the terms of this Code may result in disciplinary action, up to and including termination of employment or removal from the Board, as applicable. Violations of the Code may constitute violations of law and may result in civil or criminal penalties. For your information, all possible violations reported will be investigated. Any actual violation of this Code of Ethics will be reported to FPI's Board of Directors, along with the corrective action plan with respect to the actual violation.

If you have any questions regarding the best course of action in a particular situation, contact the Standard of Conduct Official. Any individual contacting the Standards of Conduct Official may remain anonymous by utilizing our anonymous reporting options described above when reporting suspected violation of this Code of Ethics by others.

VI. Acknowledgement

All Director, Employee, Agent and Third Party Service Provider shall receive the Code of Ethics on an annual basis. In addition, all Directors, Employees be required to sign the certification at the end of the Code of Ethics, acknowledging that they have read, understand, and will comply with terms of this Code. Each Agent will be required to sign a similar statement upon the beginning of service. Further acknowledgment for Directors, Officers, Employees and Agents will be completed in the Standards of Conduct Disclosure Forms.

VII. Definitions

- a. **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.

For purposes of this Code of Ethics, the SOC Policy and other SOC Program materials, the term "Agent" does not include title companies, brokers, auction companies, PricewaterhouseCoopers, RSM or external auditors as such persons do not have the power to act for FPI either by contract or apparent authority, do not otherwise satisfy the definition of "Agent" set forth herein, and/or are required to be independent under the law, contract, or other applicable authority (*e.g.* auditors). The Board recognizes that, in many instances, Third Party Service Providers (*i.e.* vendors) who may rely on, access, store or utilize confidential information of FPI and its Farm Credit customer, in providing a service or performing its work, do not qualify "Agent" for purposes of the SOC Policy, Code of Ethics or other SOC Program materials (*e.g.* service provider who provide technical services or services through "off the shelf" software). The requirements for engaging such Third Party Service Providers are set forth in FPI's *Vendor Management Policy*. The Standards of Conduct Official shall determine who qualifies as an "Agent" for purposes of this Policy and may consult with others, if and as need, in making any such determination.

- b. 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 the FPI when viewed from the perspective of a reasonable person with knowledge of the relevant facts.
- c. Employee:** Any individual employed on a part-time, full-time, or temporary basis by FPI, including those identified as Officers of the institution. Persons not maintained on FPI's payroll (i.e., independent contractors and temporary workers provided through temporary services agencies) are not Employees for purposes of this definition.
- d. 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.
- e. 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.

An Agreement and Personal Commitment to FPI's Code of Ethics

I acknowledge that I have received Farm Credit Financial Partners, Inc's ("FPI") Code of Ethics, dated _____ 2023, I understand my obligations as a Director, Employee, or Agent to comply with this Code of Ethics and I've had the opportunity to ask questions about this Code. I further acknowledge that I am not aware of any violations or possible violations of this Code of Ethics that have not been reported to FPI's Standards of Conduct Official or through the anonymous reporting avenues.

I understand that my agreement to comply, and my compliance with, FPI's Code of Ethics does not constitute a contract of employment with FPI.

Signature: _____ **Title:** _____

Printed name: _____ **Date:** _____

(Note: Once signed and completed, this form must be returned to FPI's Standards of Conduct Official, AnnaMaria Kiaresh. A copy of this form will be retained by FPI, and a copy will be available to you in your WorkForce Ready ("UKG") account.