

Farm Credit of Western Oklahoma Code of Ethics

Summary Statement

The Farm Credit of Western Oklahoma (Association) Code of Ethics was adopted by the Association on December 29, 2022. The Code of Ethics highlights the financial and ethical values of the Association and the expectations of each Board Director, officer and employee to conduct business with the highest ethical standards. Each Board Director, shareholder, employee, agent and third-party has access to the Code of Ethics and each Board Director and employee named in the COE affirmatively agrees to act in accordance with the values and expectations outlined therein.

The full Code of Ethics is available upon request, at no cost. To request a copy of the Code of Ethics, email Russell Strecker at russell.strecker@farmcreditloans.com.

Association Values:

Farm Credit of Western Oklahoma (Association) and its Board of Directors (Board), officers and employees are 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 the Board, officers and employees relating to ethical conduct, conflicts of interest, and compliance with the law.

This Code of Ethics applies to the Board, the Chief Executive Officer (CEO), the Chief Financial Officer, the Chief Credit Officer and other Association financial professionals as determined by the CEO, who are instrumental in accomplishing accurate and complete financial reporting.

Expectations of Board Directors and Employees:

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 CoBank, FCB (Funding Bank) and Federal Farm Credit Banks Funding Corporation (Funding Corporation) for use in preparing the Farm Credit System financial statements and related disclosures. The Association expects all of its Board 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 Policy and other policies and procedures adopted by the Association that govern the conduct of its Board and employees. This Code of Ethics is intended to supplement the Policy.

In agreeing to this Code of Ethics, each Board Director and employee pledges and agrees to:

1. Engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
2. Avoid conflicts of interest and disclose to the Association Standards of Conduct Official, as appropriate, any material transaction or relationship that you have that reasonably could be expected to give rise to a conflict, or the appearance of a conflict of interest.
3. 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 disclosure of this information unless required by applicable law or regulation or legal or regulatory process.
4. Produce full, fair, accurate, timely and understandable disclosure in Association financial statements and related financial reports or communications, as well as Association reports and documents filed with, or submitted to CoBank, the Funding Corporation and/or the Farm Credit Administration.
5. 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.
6. Promptly report any possible conflicts of interest or other possible violation of this Code of Ethics by you or by any other Board Director, employee, officer, or director to the Association Standards of Conduct Official or Association Audit Committee. If this violation is potentially material to the System financial statements, the individual contacted will notify the CoBank General Counsel or CEO or CoBank Audit Committee.

Reporting a possible violation to the Association Standards of Conduct Official or Association Audit Committee in connection with this Code of Ethics may be accomplished through the Association Whistleblower Program, which ensures the employee may remain anonymous.

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 mislead the Association's independent public accountant for the purpose of rendering the financial statements of the Association misleading. Further, your actions at all times shall be constructive to the process of generating timely and accurate financial reporting. In addition, you understand that you will be held accountable for adherence to the Code of Ethics and that your failure to observe the terms of this Code of Ethics or the Policy may result in disciplinary action, up to and including termination of employment or removal from the Board. A violation of the Association Code of Ethics or the Policy may also constitute a violation of law and may result in civil and criminal penalties for you, your supervisors or the Association.

For your information, all possible violations reported will be investigated. Any actual violation of this Code of Ethics will be reported to the Association 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, the Association Standards of Conduct Official should be promptly contacted.

**An Agreement and Personal Commitment to the
Farm Credit of Western Oklahoma Code of Ethics**

I acknowledge that I have received and read the Farm Credit of Western Oklahoma Code of Ethics, dated December 22, 2022. I have had the opportunity to ask questions about this Code of Ethics and I understand my obligations as a Board Director or an employee to comply with this Code of Ethics.

Further, I understand that my agreement to comply, and my compliance with, the Association Code of Ethics does not constitute a contract of employment with Farm Credit of Western Oklahoma.

Signature: _____ **Title:** _____

Printed name: _____ **Date:** _____

(Note: Once signed and completed, this form must be returned to the Association Standards of Conduct Official. A copy of this form will be retained by the Association, and should also be retained by the person signing above)