

# CAPITAL FARM CREDIT

## CODE OF ETHICS

Capital Farm Credit (CFC) adopted this code of ethics (the “Code”) which applies to every director, officer, and employee. We are committed to conducting business in accordance with the highest ethical standards as set forth in CFC’s Standards of Conduct Program and accompanying or related policies and procedures.

Capital Farm Credit is responsible for the preparation and distribution of its financial statements and related disclosures. Such information must be true, accurate, relevant, and complete when distributed to the Funding Corporation for use in preparing the Farm Credit System financial statements and related disclosures.

Accordingly, CFC expects and requires all of its directors, officers, employees, and agents 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. This also includes deterring wrongdoing and abiding by our Standards of Conduct Program and other policies and procedures that govern the conduct of CFC directors, officers, employees, and agents. To achieve these high ethical standards, conflicts of interest and self-dealing should be avoided.

The Code is incorporated into our overall Standards of Conduct Program and reaffirms the high standards of business conduct required of CFC and its directors, officers, and employees as set forth in 12 C.F.R. §612.2135. Terms referenced in this Code of Ethics are defined in CFC’s Standards of Conduct procedures.

### REQUIREMENTS

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- A. **All Directors, Officers, Employees, and Agents.** All directors, officers, employees, and agents are required to:
1. Maintain high ethical standards, including high standards of honesty, integrity, and fairness.
  2. Act in the best interests of CFC.
  3. Preserve the reputation of CFC and the public’s confidence in the Farm Credit System.
  4. Exercise diligence and good business judgment in carrying out official duties and responsibilities.
  5. Identify and disclose to the Standards of Conduct Official (SOCO) any conflicts of interest and/or circumstances or transactions that have the appearance of creating a conflict of interest.
  6. Refrain from participating in official action or discussion on any matter if there is an actual or perceived conflict of interest.
  7. Work with the SOCO 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 CFC is a party.
  10. Promptly report any possible illegal or unethical activity, or violation of the Standards of Conduct Program and the Code to the SOCO or through the anonymous reporting procedures.
  11. Take all reasonable measures to protect the confidentiality of non-public information about CFC 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. Additional Requirements for Directors and Officers.** In addition to the above, directors and officers are required to produce full, fair, accurate, timely, and understandable disclosures of financial statements and related financial reports or communications. This includes reports and documents filed with, or submitted to, the Farm Credit Bank of Texas, the Farm Credit Administration, and independent public accountants. Directors and officers are explicitly prohibited from taking any action to fraudulently coerce, manipulate, or mislead CFC's independent public accountant for the purposes of rendering the financial statements misleading.

## **COMPLIANCE**

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All directors, officers, employees, and agents will be held accountable for compliance with and adherence to this Code. Violations may result in disciplinary action, up to and including termination of employment or removal from the board of directors and may result in civil or criminal penalties. Each director, officer, and employee is required to sign a statement annually that he or she has read and understands this Code and agents will be made aware of our expectations.