

# ANONYMOUS REPORTING: ETHICSPPOINT™

## FARM CREDIT SERVICES OF AMERICA

### QUESTIONS AND ANSWERS

#### ***What is Anonymous Reporting?***

An anonymous reporting system enables safe, confidential, and anonymous communication of issues to responsible Farm Credit Services of America (FCSAmerica) representatives and the Board Audit Committee.

FCSAmerica's Board is committed to practicing "Sarbanes-Oxley" ethical standards even though the Farm Credit System is not subject to the "Sarbanes-Oxley" legislation. Our Board has adopted much of the legislation as "best practice" including the requirement for an anonymous reporting system.

#### ***What is EthicsPoint?***

EthicsPoint is a third-party business service that was selected to provide an anonymous reporting system. EthicsPoint is a comprehensive and confidential reporting tool used to assist FCSAmerica and its customers, business partners, and employees to work together to address fraud, abuse, and misconduct in the workplace.

#### ***Why has FCSAmerica decided to use the EthicsPoint reporting system?***

The EthicsPoint reporting system provides a vehicle to address matters directly to the Board Audit Committee. An effective reporting system can be our most useful tool for mitigating risks and reducing losses due to fraud and abuse.

#### ***What assurances do we have regarding anonymity and confidentiality?***

EthicsPoint was designed to protect the anonymity of the reporter. They are dedicated to this task and FCSAmerica is contractually bound not to seek the identity of any reporter.

- Reports placed at EthicsPoint are protected by the latest encryption technology
- EthicsPoint does not track or capture screen names or computer addresses (no cookies) to further protect the reporter's identity
- Once reports are filed, they are never emailed, faxed, or mailed and are only made available to trained personnel
- Multiple reporting options are available – reporters can file reports using the Internet and toll-free phone

#### ***What should be reported?***

EthicsPoint is designed for anyone to report any violation of our ethics standards, or other concern you may have.

#### ***What if I'm not sure if something should be reported?***

If you are unsure if you should report something, discuss it with an FCSAmerica employee, senior leader, or board member. If you are uncomfortable discussing your potential report with an employee, contact the FCSAmerica Vice President of Internal Audit for further guidance. The Vice President of Internal Audit reviews all reported concerns unless the Vice President of Internal Audit is implicated. In this case, contact the FCSAmerica Board Audit Committee.

#### ***What are the options for EthicsPoint reporting?***

Reports can be filed conveniently using one of the following two options:

##### *Toll-Free Phone Number*

FCSAmerica has a dedicated EthicsPoint toll-free phone number that is available 24 hours per day, 7 days per week: 1-866-294-4874. A compliance specialist from EthicsPoint will assist you in entering your report into the EthicsPoint system.

##### *Internet*

The Internet address: [https://secure.ethicspoint.com/domain/en/report\\_company.asp?clientid=7912](https://secure.ethicspoint.com/domain/en/report_company.asp?clientid=7912)

This Internet address can be accessed from any Internet location – your home, a public library, and others.



***Who sees the report after it is filed?***

The system immediately notifies FCSAmerica's Vice President of Internal Audit, the Chairperson of the FCSAmerica Audit Committee, the FCSAmerica Board Chair, General Counsel, and the Standards of Conduct Officer. In the unlikely event that the above-mentioned individuals are implicated, the report is forwarded to an outside law firm for proper resolution to ensure objectivity and independence.

***Will other FCSAmerica employees see the report that is filed?***

No. However, the report resolution process can involve fact-finding steps conducted by the Vice President of Internal Audit and/or other FCSAmerica representatives, depending on who is implicated. The fact-finding process protects the anonymous reporter and the confidential nature of all fact-finding is critical to the success of this system.

***Will filing a report impact my business relationship with FCSAmerica?***

No. Your report will remain anonymous and confidential and plays no role in your business relationship with FCSAmerica.

***What happens after a report is filed?***

Though different circumstances necessitate different courses of action, the following general steps will be followed. Throughout the entire process, persons filing reports can access the "Report Status" on the EthicsPoint system.

1. Report is filed
2. Reporting person receives unique, confidential username and selects a password
3. Report is reviewed for merit
4. Follow-up questions for clarification are forwarded confidentially to reporting person
5. Fact-finding efforts are performed to determine what happened and risks to the Association
6. Resolution process and corrective actions taken
7. Report included in quarterly summary report presented to the FCSAmerica Board Audit Committee

The username and password in step 2 are important. They allow the reporter to return to the EthicsPoint system either by Internet or telephone and access the original report to check "Report Status."

Further, the reporter is strongly encouraged to return to the site within three to five business days to answer any potential fact-finding or follow-up questions from the FCSAmerica representatives to resolve open issues. The reporter and FCSAmerica's personnel have now entered into an anonymous dialogue where situations are not only identified but can be resolved, no matter how complex.

***Can a reporter identify themselves if they desire?***

Yes. When filing a report, the system will ask if the reporter wishes to be identified for possible follow-up. The Association's distribution protocol will remain in effect to ensure that implicated parties are never made aware of the reporter's identity.

***Protection for Anonymous Reporters***

Reprisal and retaliation for reporting concerns and wrongdoing is prohibited by Federal laws and regulations. See the No Fear Act and the Whistleblower Protection Enhancement Act. However, action may be taken against an individual for knowingly making a false complaint or providing false information.