

# ANONYMOUS REPORTING: ETHICSPPOINT™

## AGCOUNTRY FARM CREDIT SERVICES

### QUESTIONS AND ANSWERS

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

An anonymous reporting system which enables customers, business partners, and employees (Reporters) a safe, confidential, and anonymous means of communication of issues to responsible AgCountry Farm Credit Services (AgCountry) representatives and the AgCountry Board of Directors representatives.

AgCountry's Board is committed to practicing "Sarbanes-Oxley" ethical standards even though the Farm Credit System is not subject to compliance with the federal Sarbanes-Oxley Act (Act). Our Board has adopted sections of the Act as "best practice" for AgCountry, including the requirement for an anonymous reporting system. AgCountry has also adopted a Code of Ethics to which directors, employees, and agents must comply.

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

NAVEX Global (NAVEX) is a third-party business partner of AgCountry which provides an anonymous reporting system called EthicsPoint. EthicsPoint is a comprehensive and confidential reporting tool used to assist AgCountry to address issues of fraud, abuse, and misconduct in the workplace.

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

The EthicsPoint reporting system provides a vehicle to address matters directly to the Board Audit Committee, which the Board has appointed as the internal body to address reported issues. An effective reporting system can be AgCountry's most useful tool for managing risks and minimizing losses due to fraud and abuse.

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

EthicsPoint was designed to protect the anonymity of the Reporter. NAVEX is dedicated to this task and AgCountry is prohibited from seeking the identity of any Reporter from NAVEX.

- Reports placed within 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 a report is filed, only authorized personnel will have access to the report
- Multiple reporting options are available – Reporters can file reports using the Internet, toll-free phone number, or the QR Code provided below

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

EthicsPoint is designed for anyone to report any violation of AgCountry's ethics standards, or other concern you may have, including but not limited to issues involving:

- Accounting and Auditing Matters
- Falsification of contracts, reports, or records
- Conflict of Interest
- Discrimination and Harassment
- Fraud and Theft
- Disclosure of Confidential Information

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

If you are unsure if you should report something, discuss it with an AgCountry employee, senior leader, or Board member. If you are uncomfortable discussing your potential report with an employee, contact the AgCountry Senior Vice President Internal Audit at 1-800-450-9858 for further guidance.



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

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

***Toll-Free Phone Number***

AgCountry has a dedicated EthicsPoint toll-free phone number that is available 24 hours per day, 7 days per week: 1-844-287-9779. A NAVEX compliance specialist will assist you in entering your report into the EthicsPoint system.

***Internet***

The Internet address: <https://secure.ethicspoint.com/domain/media/en/gui/51845/index.html>

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 EthicsPoint system immediately notifies AgCountry's leader of the Internal Audit function (Senior Vice President Internal Audit) and their designee, the Chairperson of the AgCountry Audit Committee, the AgCountry Board Chair, AgCountry's General Counsel, and AgCountry's Standards of Conduct Official who handles ethics matters. Anonymous report notifications involving any individual listed above will not be sent the notification.

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

Employees with access to any given report will be limited to employees noted above receiving a notification of a report and those designated to handle the report resolution process conducted under the direction of the Senior Vice President Internal Audit. Other AgCountry representatives, such as legal counsel for AgCountry, may also have access to a report, 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 AgCountry?***

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

***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, an individual filing a report 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 individual
5. Fact-finding efforts are performed to determine what happened and risks to AgCountry
6. Resolution process and corrective actions taken
7. Report included in quarterly summary report presented to the AgCountry 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 and to check "Report Status."

Further, the Reporter is strongly encouraged to return to the EthicsPoint site within three to five business days to answer any potential fact-finding or follow-up questions from the AgCountry representatives to resolve open issues. The Reporter and AgCountry's personnel may enter into an anonymous dialogue until situations are 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. AgCountry'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.

