

High Plains Farm Credit, ACA
Code of Ethics for the Association
Chief Executive Officer and Senior Financial Professionals

High Plains Farm Credit, ACA (Association) and its officers and employees are committed to conduct business in accordance with the highest ethical standards as set forth in the Standards of Conduct Policy for Employees (Policy), which is applicable to the officers and employees relating to ethical conduct, conflicts of interest, and compliance with the law.

This Code of Ethics applies to the Chief Executive Officer (CEO), the Chief Financial Officer (CFO), the Chief Credit Officer (CCO), Chief Risk Officer (CRO), Chief Lending Officer (CLO) and other Association financial professionals as determined by the CEO, who are instrumental in accomplishing accurate and complete financial reporting. 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, ACB (CoBank), for use in preparing the CoBank District (District) and Farm Credit System financial statements and related disclosures. The Association expects all of its 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 employees. This Code of Ethics is intended to supplement the Association Policy.

In agreeing to this Code of Ethics, each 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 or CEO or Association Audit Committee 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 and 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 employee, officer or director to the Association Standards of Conduct Official or CEO or Association Audit Committee. If this violation is potentially material to CoBank financial statements, the individual contacted will notify the CoBank General Counsel or CEO or CoBank Audit Committee.

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. 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 and to the CoBank General Counsel or CEO or CoBank Audit Committee, 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 or CEO should be promptly contacted.

**An Agreement and Personal Commitment to the
Association Code of Ethics for the Association
And Senior Financial Professionals**

I acknowledge that I have received and read the Association Code of Ethics for the Association CEO and Senior Financial Professionals. I have had the opportunity to ask questions about this Code of Ethics and I understand my obligations as 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 do not constitute a contract of employment with the Association.

Signature: _____ **Title:** _____

Printed name: _____ **Date:** _____

(Note: Once signed and completed, this form must be returned to 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.)