

**HIGH PLAINS FARM CREDIT, ACA**  
**Confidential and Anonymous Submission of Complaints and Concerns**

This whistleblower program (WB Program) is established by the Audit Committee for the receipt, retention and treatment of reported tips or complaints. It provides for the confidential, anonymous submission by High Plains Farm Credit, ACA (Association) directors, officers, or employees (Insiders) or others (e.g., customers, appraisers, agents, outside contractors or vendors) of concerns, complaints or tips regarding questionable matters or violations. Such matters or violations may relate to violations of law, regulation, or policy (including those relating to accounting, financial reporting, internal controls or auditing matters), or fraud, corruption, or operational weaknesses. The WB Program is designed to provide a means of collecting Insider or such other person's concerns, improving internal communication, and collecting information regarding emerging issues. In addition, this practice reinforces effective internal controls over financial reporting as required by FCA Regulations.

Additional guidance with respect to the goals and objectives of this program may be found in [FCA's Informational Memorandum dated July 9, 2015](#) and [Examination Manual 31.9 dated June 29, 2023](#).

### **Protection**

This WB Program enables those wishing to bring the sensitive issues outlined above to the attention of the Audit Committee while remaining anonymous. There will be no reprisal, retaliation or adverse action taken against any employee or other person who, in good faith, reports or assists in the investigation of a violation or suspected violation, or who makes and inquiry about the appropriateness of an anticipated or actual course of action. It also provides a mechanism for employees or other persons who report their concerns to receive a response to their issue while maintaining their anonymity. Disclosure of concerns and/or reporting issues under this program is encouraged.

### **Accessibility**

The Association will provide the resources for affected persons to provide relevant information to the Association. Communication options will be made available in Association offices, specifically on the bulletin boards within areas commonly utilized by employees and on relevant portions of the Association's website to allow affected persons to confidentially notify the Association of concerns and/or issues.

The organization retained by the Association to administer the collection of WB Program communications is Syntrio Lighthouse Services, LLC (contact information provided at the bottom of this document) (WB Vendor). WB Vendor has built a program to provide for complete anonymity to those who disclose concerns or report an issue under this WB Program.

When a report is filed with the WB Vendor, an e-mail notification that a report has been filed will be sent to the Chairperson of the Audit Committee, the Chairperson of the Board, the Vice Chairperson of the Board, the Association Chief Executive Officer (CEO) and the Association Standards of Conduct Official(s). If any of these individuals are identified in the filed report, they will be excluded from the notification. If all of these individuals are identified, notification will go directly and only to the Vice-Chairperson of the Audit Committee. Upon receipt of a notification, each of the unnamed individuals will be able to obtain a copy of the report.

After consultation among the report recipients, a response will be reported back to the WB Vendor so the reporting persons may follow up with an independent party.

### **Complaint Investigation**

Depending on the nature of the report submitted under this WB Program, the Standards of Conduct Official(s) (SOCO) will investigate the report and work with the unnamed individuals to determine the appropriate course of action and/or response to the individual filing the complaint. If the report involves one of these individuals, the remaining individual(s) will determine the appropriate course of action and/or response with other report recipients.

### **Investigation Process**

The SOCO shall review, within a reasonable amount of time, all employee and Director SOC concerns or allegations raised either to the SOCO or through the anonymous reporting procedure. The SOCO has authority to investigate whistleblowing issues as set forth herein, and should engage external resources, such as attorneys or consultants, as necessary to properly conduct an investigation. Employees, Directors, and Agents are expected to cooperate in any such investigation and are authorized to provide the SOCO or the SOCO's designee or retained investigator with information requested as part of this review, recognizing the SOCO's existing confidentiality obligations to High Plains Farm Credit, ACA.

As part of the review, the SOCO will determine:

1. Whether a real or apparent conflict of interest exists;
2. Any alleged transactions are conducted in the Ordinary Course of Business or otherwise fall within an exception outlined in this Policy;
3. Any reporting obligations are triggered by the Information or report; and
4. Whether further or an external investigation is needed or required by the Policy.

### **Coordination with CoBank, ACB and CoBank, FCB (CoBank)**

In the event that the Audit Committee, through the WB Program or other means, identifies issue(s) related to accounting, financial reporting, internal accounting controls, auditing matters or fraud, that have potential impact on CoBank, the CoBank District, or System Certifications and Reporting, said issue(s) will be reported to the CoBank CEO, CoBank CFO, and the CoBank Vice President and Director of Internal Audit. If the report involves one of these individuals, the remaining two will determine the appropriate course of action and/or response. If the nature of the complaint so warrants, the Chairperson of the CoBank Audit Committee will be notified and included in determining the appropriate course of action and/or response.

### **Audit Committee Oversight**

The Audit Committee will oversee this WB Program and will include reports to the Board on WB Program activity and related matters as part of its overall Board reporting process. Independent evaluations of the WB Program may be made from time to time as determined appropriate by the Audit Committee.

Periodically, the WB Vendor's system will be tested to ensure it adequately supports this program. The results of this testing will be reported to the Audit Committee.

### **Administration**

Administration of this program, including coordinating the implementation of this service, will be the responsibility of the Standards of Conduct Official(s). These responsibilities will include:

- Review vendor(s) in accordance with the Association [Vendor Management Policy](#) and [Procedure](#).
- Contracting with the WB Vendor and coordinating the implementation of WB Vendor services,
- Including the WB Program in audit plans, including a periodic testing of the WB Vendor system to ensure it adequately supports this WB Program and reporting the results to the Audit Committee,
- Assuring a secure tracking system for investigating, following-up on, disposing and finally closing reported tips or complaints,
- Developing appropriate training and awareness programs for Insiders and others, and
- Establishing appropriate document retention requirements for complaints and investigations.

### **Reporting**

Any tips or complaints received under this WB Program will be reviewed with the Audit Committee by the CEO and/or Standards of Conduct Official(s) at the Audit Committee's next meeting. Any suspected internal fraud or other significant event involving Insiders must be immediately reported to FCA. Any known or suspected criminal or standards of conduct violation must be reported as provided by Board policy and applicable regulations.

### **Related Authorities**

FCA Regulations §§ 618.8430 and 620.3, Part 612, subparts A and B; EM 31.9 – Standards of Conduct, Whistleblower, & Criminal Referral (6/29/2023); and Informational Memorandum dated July 9, 2015.

### **Retention**

Retention of complaints and related documentation generated under this program will be maintained by the Standards of Conduct Official(s) and in accordance with the Association retention schedule.

### **Complaints or Concerns can be submitted to:**

**Syntrio Lighthouse Services, Inc.**

**By telephone: 866.860.0008**

**By electronic submission: [www.lighthouse-services.com/highplainsfarmcredit](http://www.lighthouse-services.com/highplainsfarmcredit)**