

Whistleblower Program and Procedures (Farm Credit of Western Oklahoma)

This program is established by the Audit Committee of the Association for receiving and handling issues related to accounting, financial reporting, internal accounting controls, auditing matters, ethical considerations, misconduct or fraud. It provides for the confidential, anonymous submission by employees, borrowers, vendors, or market participants of the Association of concerns regarding questionable accounting, financial reporting, internal accounting controls, auditing matters, ethical considerations, misconduct or fraud. It is designed to provide a means of collecting employee, borrower, vendor, or market participant 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 regulation 620.3.

Protection

This program enables employees, borrowers, vendors, or market participants wishing to bring issues related to accounting, financial reporting, internal accounting controls, auditing matters, ethical considerations, misconduct or fraud to the attention of the Audit Committee while remaining anonymous. There will be no reprisal, retaliation or adverse action taken against any employee, borrower, vendor, or market participant who, in good faith, reports or assists in the investigation of a violation or suspected violation, or who makes an inquiry about the appropriateness of an anticipated or actual course of action. The program provides a mechanism for employees, borrowers, vendors or market participants who report their concerns to receive a response to their issue while maintaining their anonymity. Disclosure of concerns or reporting issues under this program is encouraged.

Accessibility

The Association will provide a toll free telephone "hotline" number to all employees, borrowers, vendors and market participants along with an internet website address. These communication avenues will be posted prominently on the Members Home page of the Association intranet for all the Association employees and on the Association public website for all borrowers, vendors and market participants. In addition, the "hotline" number and website will be posted on the home page of the association intranet commonly utilized by all employees.

The organization retained by the Association to provide this service is Navex Global - EthicsPoint. Navex Global has built a program to provide for complete anonymity to those who disclose concerns or report an issue under this program.

If an employee, borrower, vendor or market participant utilizes the telephone hotline, Navex Global personnel will answer the hotline twenty- four hours a day, seven days a week, 365 days per year. They produce a written report from this conversation to enhance the anonymity of the communication. If an employee, borrower, vendor or market participant chooses to submit a report utilizing the website, a secure and encrypted template can be accessed by simply entering the company name.

When a report is filed with Navex Global, an e-mail notification that a report has been filed will be sent to the Association Chief Executive Officer (CEO), the Standards of Conduct Official, and the Chairman of the Audit Committee. If any of these individuals

are named in the filed report, they will be excluded from the notification. If all of these individuals are named, notification will go directly and only to the Chairman of the Board. Only those individuals receiving a notification are able to access the Navex Global secure website and view the report that has been filed.

The Navex Global system provides a mechanism for anyone who files a report to learn what resulting action was taken in an anonymous manner. If the authority receiving and handling the complaint deems it appropriate, a response can be filed on the Navex Global website accessible only to the individual who filed the report.

Complaint Investigation

Depending on the nature of the report submitted under this program, the CEO, Standards of Conduct Official, and the Audit Committee Chairman will determine the appropriate investigative course of action and/or response to the individual filing the complaint. 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 Chairman of the Board will be notified and included in determining the appropriate course of action and/or response. If only the Chairman of the Board is notified of a report, it means that the CEO, Standards of Conduct Official, and the Audit Committee Chairman are all named in the report. In this event, the Chairman of the Board will confer with the Vice Chairman of the Audit Committee and the Vice Chairman of the Board to determine the appropriate course of action. However, in the normal course of business, investigative authority for any report submitted will primarily be delegated to the Standards of Conduct Officer to determine the appropriate course of action.

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

In the event that the Association Audit Committee through this program or other means identifies issue(s) related to accounting, financial reporting, internal accounting controls, auditing matters, ethical considerations, misconduct 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.

Audit Committee Oversight

Any reports received under this program will be reviewed with the Audit Committee by the CEO, the Standards of Conduct Official, and/or the Audit Committee Chairman in executive session at the Committee's next meeting. The CEO and Standards of Conduct Official are responsible for reporting corrective actions taken to the Audit Committee.

Annually, the Navex Global system will be tested to ensure it adequately supports this program. Testing shall include validation that issues reported to Navex Global are reported to the appropriate personnel as required by these procedures and that the issues are reported in a timely manner. The results of this testing will be reported to the Audit Committee.

Administration

Administration of this program, including contracting with the organization retained by the Association to provide this service and coordinating the implementation of this service, will be the responsibility of the CEO and the Standards of Conduct Official.

Training

Whistleblower program training for all employees shall occur annually in conjunction with the annual Standards of Conduct training.