

## EthicsPoint™ Frequently Asked Questions

### 1. What is Farm Credit Financial Partners EthicsPoint?

*EthicsPoint is a comprehensive and confidential reporting tool created to assist management and employees to work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment. It is not intended to replace existing policies or procedures or less formal methods of resolving internal complaints or concerns regarding routine employment matters.*

### 2. What is EthicsPoint?

*EthicsPoint is an independent reporting service that operates through an online website and by telephone on behalf of FPI. When you contact this service, you do not have to give your name (unless required otherwise by law) and your call is not recorded.*

### 3. Why did FPI contract with a third-party vendor?

*EthicsPoint offers important services that would be impractical or cost-prohibitive for FPI to provide alone. EthicsPoint provides trained interview specialists, the option of caller anonymity, 24/7 availability and aggregate reporting of trends and usage.*

### 4. For what types of situations should I contact EthicsPoint?

*EthicsPoint is designed to receive reports regarding suspected unethical or illegal activities. Such activities may include the following:*

<i>Accounting and Auditing Matters</i>	<i>Misconduct or Inappropriate Behavior</i>	<i>Sexual and Workplace Harassment</i>
<i>Conflicts of Interest</i>	<i>Misuse of Assets or Services</i>	<i>Standards of Conduct / Code of Ethics Violations</i>
<i>Data Privacy</i>	<i>Retaliation</i>	<i>Theft</i>
<i>Discrimination or Harassment</i>	<i>Sabotage or Vandalism</i>	<i>Violation of Policy</i>
<i>Employee Relations</i>	<i>Security</i>	<i>Workplace Violence</i>

### 5. Is EthicsPoint appropriate for emergencies?

*No, it is not intended for emergency use. If you need emergency assistance or believe a crime is in progress, you should notify FPI management and/or call 911 immediately.*

### 6. What happens when I contact EthicsPoint?

*A customized web form or a professional interview specialist will document your concern, relay the information to four designated FPI officials for review and follow up. Reports are handled promptly and discreetly.*

### 7. Why should I report what I know?

*We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner. FPI seeks to continue to build a successful organization with an outstanding reputation that protects the Core Values. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, and communicate concerns to FPI management or Human Resources at any time.*

**8. I am aware of some individuals involved in unethical conduct, but it doesn't affect me. Why should I bother reporting it?**

*FPI seeks to promote ethical behaviors. Misconduct has implications for the entire company and consequently all employees. All unethical conduct, at any level, ultimately hurts everyone. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.*

**9. What if I only suspect something is wrong?**

*Most instances of fraud, waste, abuse and noncompliance are discovered through tips from honest people who are not sure of all the facts. Your reporting can minimize the potential negative impact to the company. This type of good-faith report is encouraged as well as acceptable, keeping in mind that the intent of the report is to bring the issue to light, not to be malicious or hurtful.*

**10. If I know or suspect something, shouldn't I just report it to my manager or Human Resources and let them deal with it?**

*While you are encouraged to report suspected violations directly to your immediate supervisor or to Human Resources, FPI recognizes that this may not always be an option and has made EthicsPoint available for these circumstances. Keep in mind that EthicsPoint is not intended for employee complaints concerning wages, hours of work, performance evaluations, or other routine employment matters.*

**11. What if my supervisor or other managers are involved in a violation? Won't they get the report?**

*The report is accessed only by designated FPI officials. During the investigation, only the appropriate parties who need to know will be contacted to properly address the issue. If an individual is specifically named, (s)he will not receive the report.*

**12. Am I required to identify myself?**

*No. You do not have to reveal your identity to EthicsPoint. No one will know you are the reporter unless you willingly identify yourself. The information you provide will be treated as confidential and privileged. If you wish to be identified, the opportunity exists. During your report, you will be asked if you wish to be identified and you may provide your name.*

**13. What legal protection do I have when I report?**

*There are laws that protect individuals who provide confidential information regarding possible illegal activities in the workplace. Therefore, FPI is not allowed to penalize those employees who provide good-faith reports of this nature. FPI is committed to maintaining the confidentiality and anonymity of a reporter to the extent allowed by law; however, employees who intentionally and maliciously use EthicsPoint to make false allegations shall be subject to disciplinary action, if identified.*

**14. I am concerned that the information I provide EthicsPoint may ultimately reveal my identity. How can you assure me that will not happen?**

*EthicsPoint is designed to protect your anonymity; however, you need to ensure that the body of the report does not reveal your identity by accident. Use of terms such as "my boss," "in XYZ building where I work," or "since I was hired in 1998," may provide insight to your identity.*

*EthicsPoint's Privacy Statement is available on the website.*

**15. Can I file a report from home and still remain anonymous?**

*Your report is anonymous regardless of where you are when you file your report.*

**16. Where do these reports go? Who can access them?**

*Reports are accessible only by designated FPI officials. Upon further assessment of the type of violation and facts of the incident, it will be determined on a case-by-case basis and with the strictest discretion if other individuals will need to be involved in the investigation. Confidentiality is of the utmost importance.*

**17. What if I remember something important about the incident after I filed the report? What if FPI has further questions for me concerning my report?**

*When you file a report, you will receive a unique report ID number, a password, and a follow-up date. You can return to EthicsPoint again to access the original report. You can then add further information that may help resolve open issues. We strongly suggest that you return to the site in 14 days to answer any questions submitted by those reviewing the report. This will help to expedite a resolution to your report.*

**18. Are follow up reports as secure as the initial report?**

*All follow-up correspondence is held in the same strict confidence as the initial report continuing under the umbrella of anonymity.*

**19. How do I know an investigation is taking place based on my report?**

*FPI is committed to promptly investigating all reports of unethical, illegal or inappropriate activity. When an issue is reported through EthicsPoint, the specific action taken may depend on the nature and severity of the alleged violation. You can be assured that compliance-related reports will be investigated; however, in order to maintain confidentiality and anonymity of all parties involved, you may not be aware that an investigation has taken place. On the follow-up date, you will be provided with a brief message that may provide you additional information.*

**20. What should I do if I'm served with a subpoena?**

*Contact FPI's Legal department as soon as possible. Until you receive their guidance, preserve any relevant documents and avoid answering any questions, providing documentation or permitting a search of the premises. This ensures that legal rights are preserved and responses are accurate, timely, and appropriate.*

**21. To whom within FPI should I address any questions I have about EthicsPoint?**

*If you have questions or concerns about EthicsPoint, you may contact FPI's Internal Audit department.*