



This manual is an official publication of Farm Credit of Central Florida, ACA (the "Association"). The authority of the President/CEO issues it. The policies and procedures are established to direct all Association staff members in carrying out their duties and responsibilities.

THE ETHICS AND INTEGRITY OF OUR BUSINESS

Core Principles

Through our business we provide financial products and services. At the core of Farm Credit of Central Florida, ACA ("Farm Credit") are the principles of integrity, honesty and respect for people, and our reputation is founded on these. The trust and confidence of those with whom we deal, as well as the communities in which we operate, is a real asset, critical to the continued growth and success of Farm Credit.

This Code of Conduct ("the Code") summarizes the way these principles must be applied in all our dealings. The Code is intended to have practical value in all our day-to-day business dealings, and we must all behave in accordance with the spirit as well as the letter of this Code. As part of its implementation, it will be made available to all employees and will be included in appropriate induction and training programs.

Farm Credit requires the highest possible standards of professional and ethical conduct from all employees. This Code sets out the basic ethical standards that are required across the association. Equivalent standards of conduct are expected from all employees and other persons acting on behalf of the association. All employees and other persons acting on behalf of the association are expected to treat compliance with this Code as an important element of their relationship with the association.

A handwritten signature in black ink, appearing to read "Reginald T. Holt".

Reginald T. Holt
President/CEO

CODE OF ETHICS

Farm Credit of Central Florida, ACA (“the Association”) and its directors, officers and employees have committed to conduct business in accordance with the highest ethical standards as set for in the Code of Conduct, which is applicable to the directors, 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, Senior Officers and Employees. 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. The Association expects all of its directors, officers and 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 Code of Conduct 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’s Code of Conduct.

We agree to:

- a. Engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
- b. Avoid conflicts of interest and disclose to the Association Standard of Conduct Officer/CEO any material transaction or relationship that reasonably could be expected to give rise to conflict.
- c. 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.
- d. Produce full, fair, accurate, timely and understandable disclosure in Association financial statements and related financial reports or communications as well as Bank reports and documents filed with, or submitted to, the Farm Credit Administration.
- e. Comply with applicable governmental laws, rules and regulations, as well as the rules and regulations of self-regulatory agreements to which the Association is party.
- f. Promptly report any possible violation of this Code of Ethics to the Administrative Services Manager, its confidential complaint hotline, the Association Standard of Conduct Officer/CEO or Audit Committee Chairman.

We 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.

We understand that we will be held accountable for adherence to the Code of Ethics. Failure to observe the terms of this Code of Ethics may result in disciplinary action, up to and including termination of employment. Violations of the Code of Ethics may also constitute violations of law and may result in civil and criminal penalties for staff, supervisors or the Association.

If there are any questions regarding the best course of action in a particular situation, the Associations Administrative Services Manager or Association Standard of Conduct Officer/CEO should be promptly contacted. Any individual contacting the Administrative Services Manager or Association Standard of Conduct Officer/CEO may remain anonymous when reporting any possible violation of this Code of Ethics.