

OKLAHOMA AGCREDIT
Code of Ethics for the Board of Directors and Employees
July 22, 2022

Summary Statement

The Code of Ethics highlights the financial and ethical values of the Association and the expectations of each Board Director, officer and employee to conduct business with the highest ethical standards. Each Board Director, shareholder, employee, agent and third-party has access to the Code of Ethics and each Board Director and employee named in the COE affirmatively agrees to act in accordance with the values and expectations outlined therein.

Association Values

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

This Code of Ethics applies to all members of the Board, elected or appointed, all of whom are instrumental in providing oversight to all Association activities, including accurate and complete financial reporting. This Code of Ethics also applies to the Chief Executive Officer (CEO), the Chief Financial Officer, the Chief Credit Officer and other Association financial professionals as determined by the CEO, who are instrumental in accomplishing accurate and complete financial reporting.

Expectations of Board Directors 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 to CoBank, FCB (CoBank) for use in preparing the CoBank District (District) and Farm Credit System (System) financial statements and related disclosures.

The Board expects all of its members and Association 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 the Policy and other policies and procedures adopted by the Board that govern the conduct of its members and Association employees. This Code of Ethics is intended to supplement the Policy.

In agreeing to this Code of Ethics, each director 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, or, with respect to the Board, , through its oversight activities, ensure the production of, 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, the Funding Corporation and/or 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 director, to the Association Standards of Conduct Official or Association Audit Committee. If this violation is potentially material to the System financial statements, the individual contacted will notify the CoBank General Counsel or CoBank President and CEO or CoBank Audit Committee.

Reporting a possible violation to the Association Standards of Conduct Official or Association Audit Committee in connection with this Code of Ethics may be accomplished through the Association Whistleblower Program, which ensures the Director may remain anonymous.

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. A violation of the Code of Ethics or the Policy may also constitute a violation of law and may result in civil and criminal penalties for you, the Board 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, 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.