
FRESNO MADERA FARM CREDIT, ACA
CODE OF ETHICS

Adopted by: Board of Directors

Adopted Date: November 10, 2022

Revision Date(s): 11/7/2023; 12/18/2024

Reaffirmed Date(s): 8/14/2025

Policy Review Frequency: • Board: Annual Review

I. PHILOSOPHY

- A. Fresno Madera Farm Credit (“Association” or “FMFC”) is committed to conducting business in accordance with the highest ethical standards as set forth in the Standards of Conduct Policy for Directors and Employees, and the Standards of Conduct Policy for Agents (“Policy”). Moreover, the Association is responsible for preparation and distribution of its financial statements and related disclosures and for providing relevant information that is true, accurate and complete to the Funding Corporation for use in preparing the Farm Credit System (“FCS” or “System”) financial statements and related disclosures.
- B. The Association has adopted this code of ethical conduct (the “Code”) which is applicable to every Director, Officer, Employee, Agent, and Third-Party Service Provider. The Code reaffirms the high standards of business conduct required and provides guidance to the Association and its Directors, Officers, Employees, Agents, and Third-Party Service Providers.

II. PURPOSE

- A. The purpose of this Code of Ethics is to set forth expectations for Association Directors, Officers, Employees, Agents, and Third-Party Service Providers to maintain the highest standards of personal and professional integrity in all aspects of their business transactions and activities. This includes complying with all applicable laws, rules, and regulations, deterring wrongdoing and abiding by its Standards of Conduct Policy, and other policies and procedures adopted by the Association that govern the conduct of its Directors, Employees, Agents, and Third-Party Service Providers. To achieve these high ethical standards, all Directors, Officers, Employees, Agents, and Third-Party Service Providers should, among other things, avoid conflicts of interests.
- B. This Code is intended to supplement the FMFC Standards of Conduct Policies, and is considered part of the Association's Standards of Conduct Program.

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III. SCOPE

The Code of Ethics applies to all Association Directors, Employees, Agents, and Third-Party Service Providers.

IV. ROLES AND RESPONSIBILITIES

- A. For the purposes of the Code of Ethics, Roles and Responsibilities of the Association Board of Directors, CEO, and Standards of Conduct Official are outlined in the FMFC Standards of Conduct Policy for Directors and Employees. Agents and Third-Party Service Providers may request a copy of this document by contacting the FMFC Standards of Conduct office.

V. DEFINITIONS

- A. For purposes of this Code of Ethics and the Association Standards of Conduct Program, defined terms have the meanings set forth in Exhibit A – Standards of Conduct Program Definitions.

VI. COE REQUIREMENTS

- A. **All Directors, Officers, Employees, Agents, and Third-Party Service Providers.** All Directors, Officers, and Employees are required to agree to the items listed herein Section A. Agents, and Third-Party Service Providers are expected to conduct themselves as outlined herein Section A.
1. Be familiar with the information contained in the Standards of Conduct and related Code of Ethics.
 2. Comply with the Standards of Conduct Program, Code of Ethics, Anti-Harassment Policy and all applicable laws, and Regulations, as well as the rules and regulations of self-regulatory agreements to which the Association is a party.
 3. Adhere to and maintain the requirements contained in the Standards of Conduct Policy and Code of Ethics at all times in carrying out official duties.
 4. Maintain high ethical standards, including high standards of care, honesty, integrity, respect, fairness, professionalism and conduct.
 5. Treat all Employees, Directors, independent contractors, Third Party Service Providers, and customers with respect and dignity to maintain an inclusive work environment free of unlawful harassment.
 6. Act in the best interests of the Association.
 7. Preserve the reputation of the Association and the public's confidence in the Farm Credit System.

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8. When representing the Association offsite or at other venues, adhere to the applicable Standards of Conduct Policy, Code of Ethics, Anti-Harassment Policy and for Employees the Employee Handbook guidelines, and exercise diligence and good business judgement in carrying out official duties and responsibilities.
9. Identify and promptly disclose to the Standards of Conduct Official any conflicts of interest and/or circumstances or transactions that have the appearance of creating a Conflict of Interest involving the Director or Employee, Director or Employee's Family, Director or Employee's Reportable Business Entity.
10. Work with the Standards of Conduct Official to identify actual, apparent, or potential conflicts and resolve reported Conflicts of Interest and appearances of Conflicts of Interest.
11. Refrain from participating in official action or discussion on any matter if the Director, Officer, Employee, Agent, or Third-Party Service Provider has an actual or perceived conflict of interest in a matter, transaction, or activity, and avoid voting on or influencing any decision directed at such a matter, transaction, or activity.
12. Avoid self-dealing or acceptance of gifts or favors that may be deemed as offered, or have the appearance of being offered, to influence official actions or decisions or for any other personal benefit.
13. Timely report to the SOCO, or using the anonymous reporting procedures (i.e. Whistleblower Hotline accessible on the Association's website), any known or suspected activity by a person affiliated with the Association that you suspect is illegal or unethical, a violation of the Standards of Conduct Policies and Procedures, and the Code of Ethics, or misconduct. *Also refer to the section within the applicable Standards of Conduct policies covering "Duty (or Expectation in Agent Policy) to Report Unethical Behavior, Misconduct, or Violations of the Law or FMFC Policies."*
14. 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. Treat all confidential information as outlined in the FMFC Standards of Conduct Policy for Directors and Employees, the FMFC Standards of Conduct Policy for Agents, and any Association Information Security policies.
15. Fulfill applicable fiduciary duties to the Association and its stockholders.

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B. Directors, Officers, and Employees. All Directors, Officers, and Employees are required to:

1. Maintain compliance with the Standards of Conduct Policy for Directors and Employees and the Regulations as they are a condition of employment for Employees and a condition of service for Directors. For Directors, this also includes ensuring that the Director maintains their compliance with Association and FCA director eligibility requirements to serve on the Board through a self-certification process as outlined in the Director Election Policy.
2. Ensure they remain current with SOC and Code of Ethics training.
3. Devote their full business time for which they are employed (Employees) and such time as necessary (Directors) to the effective accomplishment of their official duties. Conditions for Employees around outside employment or other similar activities are outlined in Policy section "Devotion of Time to Official Duties."
4. Ensure oversight (if Directors) or produce (if Officers and Employees) full, fair, accurate, timely and understandable disclosure in reports, documents, and communications we file, submit, or furnish to Borrowers, Loan Applicants, Loan Participants, CoBank, the Funding Corporation, the Farm Credit Administration, Third-Party Service Providers and in other public communications.

C. Directors, Officers, and other Association Financial Professionals.

1. In addition, Directors, Officers, and other Association employees that are financial professionals are required to ensure oversight (if Directors) or produce (if Officers and financial professionals) full, fair, accurate, timely and understandable disclosure in Association financial statements and related financial reports filed with, submitted or furnished to, Borrowers, Loan Applicants, Loan Participants, CoBank, the Funding Corporation, the Farm Credit Administration, Third-Party Service Providers and in other public communications. Employees that qualify as financial professionals will be determined by the HR based on the employee's roles and position responsibilities.
2. Directors, Officers, and financial professionals are explicitly prohibited from taking any direct or indirect action to fraudulently influence, coerce, manipulate, or mislead the Association's independent public accountant for the purposes of rendering the Association's financial statements misleading. Further, your actions at all times shall be constructive to the process of generating timely and accurate financial reporting.

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D. Directors, Officers, Employees and Agents.

1. All Association Employees and Agents will be held accountable for adherence to the Code of Ethics and the Policy and failure to observe the terms of this Code of Ethics or the Policy may result in disciplinary or corrective action. For Employees this may include disciplinary actions up to and including termination of employment, and for Agents this may include but is not limited to a termination or non-renewal of the agency relationship. Directors may be subject to FCA action allowable under Section 5.28 and 5.29.
 - a) A violation of the Association's Code of Ethics or the Policy may also constitute a violation of law and may result in civil and criminal penalties for the Employee, the employee's supervisors or the Association.

VII. COMPLIANCE AND VIOLATIONS OF THE CODE OF ETHICS

- A. Each Director, Officer, Employee, and Agent is responsible for reading and understanding the Code of Ethics, and conducting their activities and business transactions accordingly. Third-Party Service Providers are expected to comply with the Code of Ethics and to disclose any known Conflicts of Interest to the SOCO as outlined in the FMFC Third Party Risk Management Policy and Procedures.
- B. All Directors, Officers, Employees, and Agents will be held accountable for adherence to applicable FMFC Policies, the Code of Ethics, the Standards of Conduct policies, and related SOC procedures. A failure to observe the terms of this Code or Policies may result in disciplinary or corrective action, including immediate termination of an Employee's employment, or for Agents this may include but is not limited to termination or non-renewal of the agency relationship. May also result in FCA investigation or action as well as criminal prosecution under the laws of the United States or state law. *Corrective actions are further outlined in the Standards of Conduct Policy for Directors and Employees sections "Resolution Process -Other Corrective Action" and "FCA Enforcement."*
 1. In the event an Employee or Director is convicted of a felony or any other charge which calls into question the Employee's or Director's honesty, integrity, or morals, such Employee may be terminated, or such Director may be removed, or other disciplinary action imposed in accordance with applicable Association policies, Section 5.28 and 5.29 of the Act, as provided in the Association ACA Bylaws.
 2. Additionally, Directors and Employees have a responsibility to protect the reputation and high ethical standards of Fresno Madera Farm Credit and are required to report when they observe or suspect unethical behavior, misconduct, a violation, or what they believe to be a violation of the law, the Standards of Conduct, Code of Ethics, Association policies, or guidelines. This includes reporting whether it relates to an Employee, Director, Borrower, or Third-Party Service Provider. *Refer to Standards of Conduct Policy for Directors and*

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Employees section "Duty to Report Unethical Behavior, Misconduct, or Violations of the Law or FMFC Policies."

- a) To ensure the reporting individual may remain anonymous, reporting a possible violation in connection with this Code of Ethics may be performed through the Association's Whistleblower Program.
- C. The Association reserves the right to audit/monitor systems on a periodic basis to ensure compliance with this policy. Compliance may be measured through various means, including but not limited to business tool reports, internal and external audits, and feedback.
- D. All possible violations reported or identified will be investigated by the Standards of Conduct Official in accordance with review and resolution processes set forth in the Standards of Conduct Policy for Directors and Employees. *Reporting on violations is outlined in the Code section "Reporting Requirements."*
- E. If you have any questions regarding the best course of action in a particular situation, contact the Standards of Conduct Official.

VIII. DISCLOSURE REPORTING AND CODE OF ETHICS ACKNOWLEDGEMENT

A. Exceptions

- 1. Any exception or disclosure pertaining to this Code of Ethics must be submitted to and approved by the Association's Standards of Conduct Official using the respective SOC disclosure form, or Third-Party Service Providers may contact the Standards of Conduct Official.

B. Directors and Employees

- 1. Each new Director and Employee upon election appointment, or prior to employment (as applicable), and annually thereafter is required to sign a statement that they have read and understand this Code.

C. Agents

- 1. Each new Agent, at the time of engagement and on an annual or bi-annual basis thereafter, is required to sign a statement that they have read and understand the Code. Agents that involve Association critical activities will have updated forms requested and monitored annually. All others will be requested and monitored every 2 years.

D. Process

- 1. The acknowledgement process will occur in conjunction with the Standards of Conduct acknowledgement, and within the same disclosure requirements as

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outlined in the Standards of Conduct Policy for Directors and Employees section "Disclosure Reporting and Resolution Process."

2. This disclosure and acknowledgement statement is contained in the Standards of Conduct Policy for Directors and Employees as Exhibit D - Director/Director Candidate SOC Disclosure Statement and Code of Ethics Certification, and Exhibit E – Employee SOC Disclosure Statement and Code of Ethics Certification, and the Standards of Conduct Policy for Agents as Exhibit D – Agent SOC Disclosure Statement and Code of Ethics Certification.
3. The SOCO will perform a review and resolution process, and any corrective actions will be addressed as applicable. *Details are outlined in the Policy section "Disclosure Reporting and Resolution Process."*

IX. REPORTING REQUIREMENTS

- A. The SOCO will provide quarterly reporting to the board and/or designated board committee on any material Conflict of Interest determinations and an annual summary of Code of Ethics matters for the previous twelve (12 months). Additionally, the SOCO shall further keep the CEO, designated board committee, and/or and Board informed as deemed appropriate, and additional reporting may be provided as outlined in the reporting requirements stated in the FMFC Standards of Conduct Policy for Directors and Employees, or FMFC Standards of Conduct Policy for Agents.
- B. The Code of Ethics is subject to audits or reviews to verify compliance and results will be reported to the Audit Committee and/or Board in accordance with the Association's Audit and Review Policy.
- C. Any exceptions to this Code of Ethics involving Employees, Agents, or Third-Party Service Providers will be reported to the Board by the SOCO together with, if applicable, the approval and/or corrective action taken or planned. Any material exceptions to this Policy involving Directors requires Board approval.

X. CODE OF ETHICS DISCLOSURE

- A. An up-to-date Code of Ethics will be posted on the Association's website following annual board approval and will also be available in print to any stockholder requesting it.

XI. EXHIBITS

- A. Exhibit A – Standards of Conduct Program Definitions

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XII. REFERENCES

<u>Farm Credit Act:</u>	Safety and Soundness Act of 1992, Section 514
<u>FCA Regulations:</u>	612.2130, 612.2135, 612.2140, 612.2145, 612.2150, 612.2155, 612.2157, 612.2160, 612.2165, 612.2170, 612.2260, 612.2270, 618.8300, 618.8320, 618.8325, and 618.8330.
<u>FMFC Bylaws:</u>	N/A
<u>FMFC Policies/Charters:</u>	• Acceptable Use Policy • Accounting and Financial Reporting Policy • Anti-Harassment Policy • Criminal Referrals Policy • Fraud Risk Management Policy • Director Election Policy • Information Security Policy • Records Management Policy • Standards of Conduct Policy for Directors and Employees • Standards of Conduct Policy for Agents • Third Party Risk Management Policy • Whistleblower Program and Procedures
<u>FMFC Procedures:</u>	• Criminal Referrals Procedures • Standards of Conduct Procedures • Third Party Risk Management Procedures
<u>Other:</u>	• CoBank Model Document for Code of Ethics • FCA Examination Manual 31.9 Board & Management Operations – Standards of Conduct, Whistleblower, & Criminal Referral dated 9/22/2023 • FCA Publication “The Director’s Role” • FMFC Employee Handbook • Sarbanes-Oxley Section 406

EXHIBIT A
FRESNO MADERA FARM CREDIT, ACA
STANDARDS OF CONDUCT PROGRAM DEFINITIONS

Approved by: FMFC Board of Directors

Adopted Date: November 10, 2022

Revision Date(s): 11/7/2023

Reaffirmed Date: 12/18/2024; 8/14/2025

I. DEFINITIONS

For purposes of this Policy and other Association Standards of Conduct Procedures, the following terms are defined as set forth below, excepting that words like document, record, certify, report, sign, and write generally should be interpreted to permit their electronic equivalents:

- A. **Act:** The Farm Credit Act of 1971, as amended.
- B. **Agent:** Any person, other than a Director or Employee of the Association, with the power to act for the Association either by contract or apparent authority and who currently either represents the Association in contacts with third parties or provides professional or fiduciary services to the Association.
- C. **Association:** Fresno Madera Farm Credit, ACA, including its subsidiary FLCA and PCA, all of which are organized under the Act.
- D. **Board:** The Board refers to the governing body (Board of Directors) of the Association.
- E. **Borrower:** Any Person or Entity that borrows funds from the Association. For purposes of this Policy, any associated procedures, and disclosure requirements, a reference to a "borrower" does not include a Purchased Participation Interest Borrower ("PPIB") provided the following criteria are satisfied:
 - 1. The Association has not issued stock to the PPIB;
 - 2. The Association is not otherwise in a direct lending relationship with the PPIB;
 - 3. The Association does not pay patronage directly to the PPIB;
 - 4. The Association is not in a control position for purposes of servicing decisions of the loan to the PPIB;
 - 5. Any Employee, Director or Agent involved in the transaction or activity involving the PPIB had no input in the decision to purchase the participation interest; and
 - 6. Any Employee, Director or Agent involved in the transaction or activity involving the PPIB did not use any confidential information about the PPIB in the transaction or activity and did not receive any benefit in the transaction or activity as a result of their position with the Association.

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- F. **Business Transaction, Transacts Business or Business Relationship:** As used herein, the relationship of a Director or Employee with another Person which involves the purchase, sale, lease, ownership, or management of real or personal property; or the provision of such services, such as a real estate agent or broker; the sale or placement of insurance; sale barn activities; appraisal services; the borrowing or lending of money or other things of value; providing or receiving financial, professional, or other services; and any other similar transaction. The term does not include arm's length relationships or transactions on fair market value terms associated with personal, family, or household matters or the establishment of checking, passbook savings, or credit card accounts, or the provision of services and/or purchase or sale of goods on a retail basis on terms offered to the general public.
- G. **CEO:** The CEO refers to the President and Chief Executive Officer of the Association.
- H. **CoBank:** CoBank means CoBank, FCB or CoBank, ACB, as the context requires. This is also referred to the Supervising Institution for FMFC.
- I. **CoBank OFI:** This refers to an OFI having an access or discount relationship with CoBank.
- J. **Code of Ethics:** A written statement of the principles and values the Association follows to establish a culture of ethical conduct for Directors and Employees, including, at a minimum, the core principals established under 12 C.F.R. § 612.2135.
- K. **Confidential Information:** This shall mean all written policies, procedures, plans, designs, programs and technical data; customer accounts and Agent lists; computer software programs and related documentation; copyrights, trade secrets, trademarks, service marks or trade names relating to any processes, procedures or products used by the Association or a District Institution or their customers, or related to their business or operations; files, manuals, forms or other business materials; flow charts, proposals, marketing and business plans; methods of consulting procedures and innovative techniques; pricing information, policies, formulas, and techniques; any document marked "confidential," any information which the Employees or Directors might reasonably expect to be regarded as "confidential," and any information that has been provided in confidence to the Employee or Director by any person or Entity with respect to the Association or a District Institution or their customers; any information (i.e., identity, credit and business requirements, etc.) that has been provided in confidence to the Employee or Director regarding the customers of a District Institution, including the Association, and all other tangible or intangible knowledge or information of a confidential nature acquired at or after the date hereof with respect to the business and operations of the Association or a District Institution. Confidential Information shall include all the foregoing, which is learned or developed, in whole or in part, by the Employee or Director, or otherwise comes into the Employee's or Director's possession, control or knowledge, in connection with, or arising out of, the Employee's or Director's affiliation with the Association. Confidential Information shall not include any information, data, or documentation that is publicly disclosed by the party to which it pertains, anything generally known or available to the public, or that is produced or

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disclosed by any party pursuant to applicable law, regulation, or court or administrative order.

- L. **Conflicts of Interest:** A set of circumstances or the appearance thereof where a person has a financial interest in a transaction, relationship, or activity that could or does actually affect (or has the appearance of affecting) that person's ability to perform official duties and responsibilities in a totally impartial manner and in the best interest of the Association when viewed from the perspective of a reasonable person with knowledge of the relevant facts.
- M. **Director:** A member of the Board of Directors of the Association (the "Board").
- N. **District Institution:** CoBank, any CoBank OFI, any Association in the Farm Credit District, or any Service Corporation operating in the Farm Credit District, including: AgVantis, Inc., Financial Partners, Inc., and Farm Credit Foundations ("Foundations").
- O. **Employee:** Any individual employed on a part-time, full-time, or temporary basis by the Association, including those identified as officers of the Association. Persons not maintained on the Association's payroll (i.e., independent contractors) are not Employees for purposes of this definition.
- P. **Entity:** A corporation, company, association, firm, joint venture, partnership (general or limited), trust (business or otherwise), or other business operations whether or not incorporated.
- Q. **Fair Market Value:** This means the most probable price which property should bring in a competitive and open market under all conditions requisite to a fair sale, the buyer and seller, each acting prudently and knowledgeably and assuming the price is not affected by undue stimulus.
- R. **Family:** Parents, spouses or civil union partners, children, siblings, uncles, aunts, nephews, nieces, grandparents, grandchildren, and the spouses of the foregoing whether arising from biological, adoptive, marital, or other legal means (e.g., stepparents, stepchildren, half-siblings, in-laws). The term also includes (1) anyone residing in the household or who is a legal or financial dependent, regardless of any familial relationship, and (2) domestic partners as defined by California state law.
- S. **Farm Credit District:** Refers to the territories established by FCA in which the associations are authorized to operate under the Act.
- T. **Financial Interest:** An interest in an activity, transaction, property, or relationship with a person that involves receiving or providing something of monetary value or other present or deferred compensation.
- U. **Institution Affiliated Party:** Refers to the following parties as defined in Part C of Section V of the Act
 - 1. A Director, Officer, Employee, shareholder, or Agent of a System institution;

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- 2. An independent contractor (including an attorney, appraiser, or accountant) who knowingly or recklessly participates in:
 - a) A violation of law (including regulations) that is associated with the operations and activities of one or more System institutions;
 - b) A breach of fiduciary duty; or
 - c) An unsafe practice that causes or is likely to cause more than a minimum financial loss to, or a significant adverse effect on, a System institution.
 - 3. Any other person as determined by the FCA (by regulation or on a case-by-case basis) who participates in the conduct of the affairs of a System Institution.
- V. **Financially Obligated With:** Having a legally enforceable joint obligation with, being financially obligated on behalf of (contingently or otherwise), having an enforceable legal obligation secured by property owned by another person, or owning property that secures an enforceable legal obligation of another.
- W. **Loan Applicant:** Any Person who has applied for a loan from the Association.
- X. **Loan Participant:** A lender having an access, syndication or participation relationship with the Association or CoBank.
- Y. **Material:** The interest or transaction (or series of transactions viewed in the aggregate) is of such magnitude that a reasonable person with knowledge of the relevant facts would question the ability of the person who has the interest or is a party to such transaction(s) to perform their official duties objectively and impartially and in the best interest of the Association and its statutory purpose. An exception for those matters affecting all shareholders or borrowers may be used in making the determination of materiality.
- Z. **Material Financial Interest:** A Financial Interest, transaction (or series of transactions viewed in the aggregate) that exceeds \$5,000 (for Employees or Agents) or \$15,000 (for Directors) in one calendar year is presumed to be Material.
- AA. **Material Percentage:** Having five (5) percent of equity in or having the power to vote five (5) percent or more of any class of voting securities with respect to a Reportable Business Entity.
- BB. **Mineral Interest:** Any interest in minerals, oil or gas, including but not limited to, any right derived directly or indirectly from a mineral, oil, or gas lease, deed, or royalty conveyance.
- CC. **OFI:** Other financing institutions which have established an access relationship with the Association under Section 1.7(b)(1)(B) of the Act.

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- DD. **Officer:** The salaried Chief Executive Officer, President, Vice President, Secretary, Treasurer, General Counsel, Chief Financial Officer, and Chief Lending Officer of the Association, and any person not so designated but who holds a similar position of authority.
- EE. **Ordinary Course of Business:** When applied to a transaction, this term means:
1. A transaction that is usual and customary in the business in question on terms that are not Preferential; or
 2. A transaction with a person who is in the business of offering the goods or services that are the subject of the transaction on terms that are not Preferential.
- FF. **Person:** An individual or entity (including sole proprietorships).
- GG. **Preferential:** The transaction is not on the same terms as those prevailing at the same time for comparable transactions for other persons who are not Directors, Employees or Agents of a System Institution.
- HH. **Regulations:** Refers to the Regulations promulgated by the FCA.
- II. **Reportable Business Entity:** An entity in which the reporting individual, directly, or indirectly, or acting through or in concert with one or more persons:
1. Owns a Material Percentage of the equity;
 2. Owns, controls, or has the power to vote a Material Percentage of any class of voting securities; or
 3. Has the power to exercise a Material influence over the management of policies of such entity from their status as a partner, director, officer, or majority shareholder in the entity.
- JJ. **Resolved:** An actual or apparent Conflict of Interest is “resolved” when it has been addressed with an action such as recusal, divestiture, approval or exception, job reassignment, employee supervision, employment separation or other action, with the result that a reasonable person with knowledge of the relevant facts would conclude that the conflicting interest is unlikely to adversely affect the person's performance of official duties in an objective and impartial manner and in furtherance of the interests and statutory purposes of the Farm Credit System.
- KK. **Service Corporation:** This refers to any service corporation authorized under by Section 4.25 of the Act.
- LL. **Standards of Conduct Official or “SOCO”:** A person appointed by the Association's Board pursuant to this Policy to administer and report on the Association's Standard of Conduct Program as well as investigate allegations of misconduct by Association Directors, Employees or Agents.

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- MM. **Standards of Conduct Program:** The policies and procedures, including this Policy, internal controls and other actions the Association has implemented to put into practice the requirements of FCA SOC regulations.
- NN. **Supervised Institution:** A term which only applies within the context of a Farm Credit bank or an employee of a System bank and refers to each association supervised by that Farm Credit bank.
- OO. **Supervising Institution:** A term that only applies within the context of an association or an Employee of an association and refers to the Farm Credit bank which supervises that association. [The Supervising Institution of Fresno Madera Farm Credit is CoBank, ACB.]
- PP. **System:** Refers to the Farm Credit System.
- QQ. **System Institution or Institution:** Any Farm Credit System bank, association or service organization chartered under Section 4.25 of the Act, and the Funding Corporation. It does not include the Federal Agricultural Mortgage Corporation.
- RR. **Third-Party Service Provider:** Any business arrangement between the Association and another person or entity, by contract or otherwise. This includes activities that involve outsourced products or services, use of independent consultants, services provided by affiliates and subsidiaries, joint ventures, and other business arrangements where the Association has an ongoing relationship or access to Association information assets or systems. Third party relationships generally do not include customer relationships. May also be referred to as service providers or vendors.