ANTI-MONEY LAUNDERING & USA PATRIOT ACT CERTIFICATION

This Certification provides a brief statement of CoBank's program for compliance with federal laws and regulations governing anti-money laundering and anti-terrorist financing (herein collectively referred to as "AML"). This statement is intended for use by financial institutions that may process transactions through CoBank and require a certification in connection with their own compliance programs.

CoBank's board of directors and senior management are committed to AML compliance. It is the policy of CoBank and its subsidiary ("CoBank" or "the bank") to comply with AML laws and regulations including the Bank Secrecy Act (BSA), the USA PATRIOT Act, and the Office of Foreign Asset Control (OFAC) regulations. CoBank's Compliance Program includes the following key elements:

- ***Compliance Officer*** – A designated Compliance Officer is responsible for establishing and directing bank-wide AML compliance processes and procedures, and reports to executive management on compliance efforts.
- ***Internal Controls, Practices and Procedures*** – CoBank has implemented risk-based internal controls, practices and procedures to detect and report potential instances of money laundering or terrorist financing, including:
  - Customer identification
  - Risk-based, client-focused controls:
    - Customer Identity Verification
    - Know Your Customer due diligence
    - Ongoing transaction and account monitoring
  - Clear and timely reporting of suspicious activity to appropriate regulatory authorities
  - OFAC monitoring
- ***Employee Training and Awareness*** – CoBank ensures appropriate AML and OFAC training and awareness programs are provided to all employees commensurate with their job functions.
- ***Independent Review*** – CoBank's Internal Audit group performs periodic independent testing and evaluation of the Compliance Program, and reports its findings directly to the board of directors.

CoBank is an Agricultural Credit Bank in the United States of America, and is regulated by the U.S. Farm Credit Administration. The bank maintains a primary place of business that is located at a physical address in the United States, with several hundred employees. Operating records related to banking activities are maintained at this primary location, and are subject to inspection by appropriate U.S. federal agencies.

CoBank does not conduct business with foreign shell banks.

Additional information about CoBank, its management, products, services and locations, is available at www.cobank.com. For any questions regarding this document, please contact Laurie Kelly, Compliance Officer, via email at lkelly@cobank.com.

Laurie S. Kelly
Compliance Officer
CoBank, ACB