



ANTI-MONEY LAUNDERING & USA PATRIOT ACT CERTIFICATION

This Certification provides a brief statement of CoBank's program for compliance with applicable federal 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.

It is the policy of CoBank and its subsidiary ("CoBank") to comply with all applicable AML laws and regulations including, but not limited to, 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 components:

- **Senior Management Commitment** – CoBank's board of directors and senior management are committed to AML compliance and emphasize its importance throughout the bank.
- **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.
- **AML Policies and Procedures** – CoBank has enacted bankwide policies and procedures for the detection and appropriate reporting of money laundering and terrorist financing, including:
 - OFAC monitoring
 - Customer identification
 - Risk-based, client-focused controls:
 - o Know Your Customer (KYC)
 - o AML customer risk assessments
 - o Standard and enhanced due diligence
 - o Ongoing transaction and account monitoring
- **Comprehensiveness** – CoBank's compliance program addresses all relevant laws and regulations, including:
 - BSA
 - OFAC
 - USA PATRIOT Act
 - Federal Farm Credit Administration regulations (CoBank's regulator)
- **Clear Accountability** – CoBank's compliance program includes clearly defined roles and responsibilities for all levels of employees
- **Relevant Expertise** – CoBank ensures appropriate AML training and awareness programs are provided to all employees, from general overviews of the program, to specific, targeted training based on job functions
- **Escalation** - Clear and timely reporting of suspicious activity to appropriate regulatory agencies and authorities
- **Objectivity** - Independent testing, assessment and re-evaluation of the compliance program on an annual basis by CoBank's Internal Audit group

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.

A handwritten signature in cursive script that reads "Laurie S. Kelly".

Laurie S. Kelly
Compliance Officer
CoBank, ACB
Rev 4/9/07