



Annual Report to Shareholders

Institution:

Report Year:

SCD:

Preparing and Filing Reports

When examining an Annual Report to Shareholders, be aware of the general guidance in FCA Regulation [620.2\(d\)](#) and [\(e\)](#). This guidance addresses options for incorporating information by reference, as well as requirements for preparing certain disclosure items.

Question	Response	Comment
1. Was an electronic copy of the report, including financial statements and related schedules, exhibits, and all other papers and documents that are a part of the report, sent to FCA within 75 calendar days of the end of the institution's fiscal year? 620.2(a) ; 620.4(a)(1) ; 2/7/2008 Informational Memorandum		
2. Did the institution publish a copy of its annual report on its Web site at the time it sent FCA an electronic copy? 620.4(a)(2)		
3. Did the institution provide prior written notification to its shareholders that the institution will publish its annual report on the institution's Web site when it is sent electronically to FCA? 620.4(a)(3)		
4. Did the institution prepare and provide to its shareholders an annual report within 90 calendar days of the end of its fiscal year that is substantively identical to the copy of the report that it sent to FCA? 620.4(a)(4) ; Disclosure and Reporting FAQ #7 <i>Note 1: Electronic delivery of the report to shareholders requires prior shareholder agreement per 620.2(c). Refer to Disclosure and Reporting FAQ #6 for additional clarification.</i> <i>Note 2: If a shareholder requests a copy of the annual report, the institution must provide it. The first copy shall be provided to the requestor free of charge per 620.2(h)(3). Institutions must provide the annual report in a paper format when an individual shareholder did not consent to electronic delivery.</i> <i>Note 3: The distribution list for the report to shareholders should include all those owning an equity interest in the institution, whether separately or jointly. For joint stockholders known to be living in the same household, both the envelope and correspondence must be addressed to all stockholders at that address. Refer to FCA's Informational Memorandum dated February 4, 2021 on Maintaining and using stockholder lists for details.</i>		
5. Are the reports available for public inspection at the issuing institution? 620.2(b)		

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Question	Response	Comment
<p><i>Note 1: Farm Credit bank (bank) reports must also be available for public inspection at each of their related associations' office(s).</i></p> <p><i>Note 2: Institutions must make the reports available in paper format if requested or when an individual shareholder did not consent to electronic delivery. 620.2(c)</i></p> <p><i>Note 3: Under the capital regulations, banks must make certain other disclosures (described in Tables 1 through 10 of 628.63) publicly available for the last 3 years (that is, 12 quarters) or such shorter period beginning on January 1, 2017. 628.63(a)</i></p>		
6. Did the institution present its reports in accordance with generally accepted accounting principles (GAAP) and in a manner that provides the most meaningful disclosure to shareholders? 620.2(g) ; 621.3(b)		
7. <u><i>If the institution presented its annual and quarterly financial statements on a combined or consolidated basis</i></u> , did it also include in the report the statement of condition and statement of income of the institution on a stand-alone basis? 620.2(g)(1)		
<p><i>Note: The stand-alone statements may be in summary form and must disclose the basis of presentation if different from accounting policies of the combined or consolidated statements.</i></p>		
8. <u><i>For any bank that prepares its financial statements on a stand-alone basis</i></u> , did it provide in the footnotes or in a supplement accompanying its annual report a condensed statement of condition and statement of income for the bank and its related associations on a combined basis? 620.2(g)(2)		
<p><i>Note: The combined bank and association financial information may be unaudited but must disclose the basis of presentation if different from accounting policies used for the bank-only statements. If the combined financial information is presented in a supplement, the supplement must be referenced within the bank's annual report and accompany the annual report when distributed. Also, all combined information provided through either a footnote or supplement will be considered part of the bank's annual report, subject to the same annual report preparation, distribution, and accuracy requirements of Part 620.</i></p>		
9. Did the institution's annual report state, regarding quarterly reports:		
a. The institution's quarterly reports are available free of charge on request? 620.2(h)(1)(i)		
b. The approximate dates the quarterly reports will be available? 620.2(h)(1)(ii)		
c. The telephone numbers and addresses (including information on any other distribution method the institution makes available) where shareholders can request or obtain copies of the quarterly reports? 620.2(h)(1)(iii)		

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Question	Response	Comment
<i>Note: Institutions must provide the reports in paper format if requested. 620.2(c)</i>		
d. Were each of the above statements in a prominent location within the report or notice? 620.2(h)(1)		
10. <i>For associations</i> , did the report state:		
a. That the shareholders' investment in the association may be materially affected by the financial condition and results of operations of the related bank? 620.2(h)(2)(i)		
b. That (if not otherwise provided) a copy of the bank's financial reports to shareholders will be made available free of charge on request? 620.2(h)(2)(ii)		
c. The telephone numbers and addresses (including information on any other distribution method the association makes available) where shareholders can request or obtain copies of the related bank's financial reports? 620.2(h)(2)(iii) <i>Note: Institutions must provide the reports in paper format if requested. 620.2(c)</i>		
d. Were each of the above statements in a prominent location within the report? 620.2(h)(2)		
11. Did the reporting institution disclose all events that have affected one or more related organizations that are likely to have a material effect on the financial condition, results of operations, cost of funds, or reliability of sources of funds of the reporting institution? 620.2(i) <i>Note 1: Refer to 620.1 for definitions of related organization, significant event, and material.</i> <i>Note 2: Any significant event affecting the reporting institution that occurred during the preceding fiscal quarters that continues to have a material effect on the reporting institution shall be considered significant events of the current fiscal quarter and shall be disclosed in the reports.</i>		
12. <i>For banks</i> , if the bank experienced a significant event that had a material effect on affiliated associations, did the bank provide its annual report to the shareholders of all related associations and coordinate its distribution with the association? 620.4(b)		

Accuracy of Reports

13. Were all disclosures by the institution made to shareholders or the general public concerning any matter required to be disclosed complete, accurate, and not misleading? 620.3(a)		
14. Is the name and position title of each person signing the report printed beneath his or her signature? 620.3(b)		

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Question	Response	Comment
<p><i>Note: If any person required to sign the report did not sign the report, the name and position title of the individual and the reason(s) such individual was unable or refuses to sign must be disclosed in the report.</i></p>		
15. Was the report dated and signed by the chief executive officer (CEO)? 620.3(b)(1)		
16. Was the report dated and signed by the chief financial officer (CFO), or if the institution has no CFO, the officer responsible for preparing financial reports? 620.3(b)(2)		
17. Was the report dated and signed by a board member formally designated by action of the board to certify reports on behalf of individual board members? 620.3(b)(3) <i>Note: The board should maintain this designation in its records and keep it up-to-date.</i>		
18. Did the signatories of the report: <i>Note 1: If any signatory is unable to, or refuses to, certify the report, the institution must disclose the individual's name and position title and the reason(s) such individual is unable or refuses to certify the report.</i> <i>Note 2: The certifications below generally satisfy the attestation requirements in 628.62(b) for banks.</i>		
<p>a. Certify the report was financially accurate? 620.3(c) <i>Note 3: This requirement would be met if the signatories completed the certification addressed in row d below.</i></p>		
b. Certify they reviewed the report? 620.3(c)(1)		
c. Certify the report was prepared in accordance with all applicable statutory or regulatory requirements? 620.3(c)(2)		
<p>d. Certify the reported information is true, accurate, and complete to the best of signatories' knowledge and belief? 620.3(c)(3) <i>Note 4: For banks, the certification of a "complete" report must be modified to clarify if disclosures made pursuant to Part 628 are restricted in content pursuant to 628.62(c). In those cases, the certification of completeness will need to include the explanation required by 628.62(c).</i></p>		
19. <u>For institutions with over \$1 billion in total assets (as of the end of the prior fiscal year)</u> , did the report include a report by management assessing the effectiveness of the institution's internal control over financial reporting? 620.3(d) <i>Note: The assessment must be conducted during the reporting period and be reported to the institution's board of directors.</i>		
20. <u>For institutions with over \$1 billion in total assets (as of the end of the prior fiscal year)</u> , did the report disclose any material		

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Question	Response	Comment
<p>change(s) in the internal control over financial reporting occurring during the reporting period? 620.3(d)</p> <p><i>Note: This requirement relates to any material changes during the current reporting period which affect the assessment completed in conjunction with the last annual report.</i></p>		

Contents of the Annual Report

Description of Business		
21. Did the report contain a Description of Business which included a brief discussion of the following items:		
a. The territory served? 620.5(a)(1)		
b. The persons eligible to borrow? 620.5(a)(2)		
c. The types of lending activities engaged in and related services offered? 620.5(a)(3)		
d. <i>For banks</i> , did the report briefly describe the lending and related services offered by its related associations, as well as related services offered to the borrowers in the bank's chartered territory by any service corporation chartered under the Act in which it has an ownership interest? 620.5(a)(3)		
e. <i>For associations</i> , did the report briefly describe the lending and related services offered by its related organizations or incorporate by reference relevant portions of the related bank's report, if such report is provided to association shareholders? 620.5(a)(3)		
f. Any significant developments within the last 5 years that had or could have a material impact on earnings, interest rates to borrowers, patronage, or dividends, including, but not limited to, changes in the reporting entity, changes in patronage policies and practices, and financial assistance provided by or to the institution through loss-sharing or capital preservation agreements or from any other source? 620.5(a)(4)		
<i>Note: FCA Bookletter BL-074 includes direction for disclosure responsibilities related to wholesale funding arrangements and its impact on interest rate risk management.</i>		
g. Any acquisition or disposition of material assets during the last fiscal year, other than in the ordinary course of business? 620.5(a)(5)		
h. Any material change during the last fiscal year in the manner of conducting the business? 620.5(a)(6)		

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Question	Response	Comment
<p><i>Note: FCA Bookletter BL-074 includes direction for disclosure responsibilities related to wholesale funding arrangements and its impact on interest rate risk management.</i></p>		
<p>i. Any seasonal characteristics of the institution's business? 620.5(a)(7)</p>		
<p>j. Any concentrations of more than 10 percent of its assets in particular commodities or particular types of agricultural activity or business, and the institution's dependence, if any, upon a single customer, or a few customers, including other financing institutions (OFIs), the loss of any one of which would have a material effect on the institution? 620.5(a)(8)</p>		
<p>k. A brief description of the business of any related Farm Credit institution, as described in 619.9146 of this chapter, and the nature of the institution's relationship with such organization? 620.5(a)(9)</p>		
<p>l. Any business relationship with any unincorporated business entity (UBE) as defined in 611.1151? If the UBE was organized by the institution or if the institution has an equity interest, the description must include:</p> <ul style="list-style-type: none"> • UBE Name • Type of business entity • Purpose for which the UBE was organized • Scope of the UBE activities • Level of ownership <p>If the institution does not have an equity interest in the UBE, but manages the operations of a UBE that is controlled by a System institution, the description must include the business relationship and any fees received. 620.5(a)(11)</p> <p><i>Note: If the UBE was organized for the purpose of acquiring and managing unusual or complex collateral associated with loans, the institution need only disclose the name of the UBE, the type of business entity, and the purpose for which the UBE was organized.</i></p>		
<p>22. <u>For associations</u>, in a separate section of the annual report were the following disclosed:</p>		
<p>a. A discussion of the interdependent relationship between the association and its funding bank, including, but not limited to, the financial relationship, a service provider relationship, other material operational relationships, and other specific issues or areas that create a material</p>		

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Question	Response	Comment
<p>interdependent relationship between the association and its funding bank? 620.5(a)(10)</p> <p><i>Note: This separate section may incorporate by reference information from other sections of the annual report.</i></p>		
<p>b. A statement that the shareholders' investment in the association may be materially affected by the financial condition and results of operations of the related bank? 620.2(h)(2)(i); 620.5(a)(10)</p>		
<p>c. A statement noting that the association is obligated to borrow only from the bank, or a statement noting that the bank has given the association approval to borrow elsewhere? 620.5(a)(10)(i)</p>		
<p>d. The major terms of any capital preservation, loss sharing, or financial assistance agreements between the association and the bank, if applicable? 620.5(a)(10)(ii)</p>		
<p>e. Any statutory or bank bylaw provisions authorizing bank access to the capital of the association, if applicable? 620.5(a)(10)(iii)</p>		
<p>f. The extent the bank assumed the association's exposure to interest rate risk, if applicable? 620.5(a)(10)(iv)</p> <p><i>Note: FCA Bookletter BL-074 includes direction for disclosure responsibilities related to wholesale funding arrangements and its impact on interest rate risk management.</i></p>		
Description of Property		
<p>23. Did the report contain a Description of Property which stated the location of and briefly described the principal offices, i.e., headquarters, and major facilities where the institution makes and services its loans, and other materially important physical properties (other than property acquired in the course of collecting a loan) of the institution? 620.5(b)</p>		
Legal Proceedings and Enforcement Action		
<p>24. In a legal proceedings and enforcement action section, did the report describe:</p>		
<p>a. Any material pending legal proceedings, other than ordinary routine litigation incidental to the business, to which the institution is a party, of which any of its property is the subject, or which involved claims that the institution may be required by contract or operation of law, to satisfy? 620.5(c)(1)</p>		
<p>b. The type of and reason for each enforcement action in effect, i.e., agreements, cease and desist orders, temporary cease and desist orders, prohibitions and removals of officers or directors, or civil money</p>		

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Question	Response	Comment
penalties, if any, imposed or assessed on the institution or its officers or directors and the amount of any civil money penalties assessed? 620.5(c)(2)		
Capital Structure		
25. Did the report contain a description of capital structure which describes the following for each class of stock and participation certificates the institution is authorized to issue: 620.5(d)(1)		
a. The rights, duties, and liabilities of each class? 620.5(d)(1)		
b. The number of shares of each class outstanding? 620.5(d)(1)(i)		
c. The par or face value? 620.5(d)(1)(ii)		
d. The voting and dividend rights? 620.5(d)(1)(iii)		
e. The order of priority upon impairment or liquidation? 620.5(d)(1)(iv)		
f. The institution's retirement policies and restrictions on transfer? 620.5(d)(1)(v)		
g. The statutory requirement that a borrower purchase stock as a condition to obtaining a loan? 620.5(d)(1)(vi)		
h. The manner in which the stock is purchased (i.e., promissory note to the issuer, or cash not advanced by issuing institution)? 620.5(d)(1)(vii)		
i. The statutory authority of the institution to require additional capital contributions, if any? 620.5(d)(1)(viii)		
j. The statutory and regulatory restrictions regarding retirement of stock and distribution of earnings pursuant to 615.5215 , and any requirements to add capital under a plan approved by FCA pursuant to 615.5350 , 615.5351 , 615.5353 , 615.5357 , or 628.301 ? 620.5(d)(1)(ix)		
26. Did the report describe regulatory minimum capital standards, and the institution's compliance with such standards? 620.5(d)(2)		
27. <i>For banks</i> , did the report discuss any related associations that are not currently in compliance with the standards? 620.5(d)(2)		
28. Did the report state whether the institution is currently prohibited from retiring stock or distributing earnings by the statutory and regulatory restrictions described for question 25j (above), or knows of any reason such prohibitions may apply during the fiscal year subsequent to the fiscal year just ended? 620.5(d)(3)		

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Question	Response	Comment
29. Did the report describe the institution's capital adequacy requirements and the minimum stock purchase requirement in effect? 620.5(d)(4)		
Description of Liabilities		
30. Did the report contain a description of liabilities section which described separately the institution's insured and uninsured debt, indicating the type, amount, maturity, and interest rates of each category of obligations outstanding at the end of the fiscal year just ended? 620.5(e)(1)		
31. Did the report describe the nature of the insurance provided under Part E, Title V of the Act ? 620.5(e)(1) <i>Note: Part E deals with the Farm Credit System Insurance Corporation.</i>		
32. Did the report describe any applicable statutory and regulatory restrictions on the institution's ability to incur debt? 620.5(e)(1)		
33. Did the report describe fully the institution's rights and obligations under any agreement, formal or informal, between the institution and any other person or entity having to do with capital preservation, loss sharing, or any other form of financial assistance? 620.5(e)(2)		
34. Did the report describe any statutory authorities or obligations to contribute to or on behalf of another institution of the Farm Credit System? 620.5(e)(3)		
35. Did the report describe supplemental retirement plans funded by the institution on behalf of senior officers and employees, including the following for each plan: <i>Note: Refer to 619.9335 for a definition of a supplemental retirement plan (SRP). Also, note that a defined benefit plan that was available to all employees on the same basis when it was accepting participants but that is now closed would not be considered an SRP.</i>		
a. Plan name? 620.5(e)(4)(i)		
b. Present value of accumulated benefits? 620.5(e)(4)(ii)		
c. Payments made during the reporting period? 620.5(e)(4)(iii)		
d. Funded and unfunded obligations? 620.5(e)(4)(iv)		
e. Off-balance sheet amounts, including benefits earned but not vested? 620.5(e)(4)(v)		
Selected Financial Data		
36. <i>For banks and direct lender associations</i> , did the report furnish in comparative columnar form for each of the last 5 fiscal years the following financial data, <u>if material</u> :		
<i>Balance sheet:</i> 620.5(f)(1)(i)		

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Question	Response	Comment
a. Total assets? 620.5(f)(1)(i)(A)		
b. Investments? 620.5(f)(1)(i)(B)		
c. Loans? 620.5(f)(1)(i)(C)		
d. Allowance for credit losses? 620.5(f)(1)(i)(D)		
e. Net loans? 620.5(f)(1)(i)(E)		
f. Other property owned? 620.5(f)(1)(i)(F)		
g. Total liabilities? 620.5(f)(1)(i)(G)		
h. Obligations with maturities less than 1 year? 620.5(f)(1)(i)(H)		
i. Obligations with maturities longer than 1 year? 620.5(f)(1)(i)(I)		
j. Protected borrower capital? 620.5(f)(1)(i)(J)		
k. At-risk capital, including: <ul style="list-style-type: none"> • Stock and participation certificates? • Allocated surplus? • Unallocated surplus? 620.5(f)(1)(i)(K) 		
<i>Statement of income: 620.5(f)(1)(ii)</i>		
l. Net interest income? 620.5(f)(1)(ii)(A)		
m. Provision for credit losses? 620.5(f)(1)(ii)(B)		
n. Extraordinary items? 620.5(f)(1)(ii)(C)		
o. Net income? 620.5(f)(1)(ii)(D)		
<i>Key Financial Ratios: 620.5(f)(1)(iii)</i>		
p. Return on average assets? 620.5(f)(1)(iii)(A)		
q. Return on average protected borrower capital and at-risk capital? 620.5(f)(1)(iii)(B)		
r. Net interest margin as a percentage of average earning assets? 620.5(f)(1)(iii)(C)		
s. Protected and at-risk capital-to-total assets? 620.5(f)(1)(iii)(D)		
t. Net chargeoffs-to-average loans? 620.5(f)(1)(iii)(E)		
u. Allowance for credit losses-to-loans? 620.5(f)(1)(iii)(F)		
<i>Net income distributed: 620.5(f)(1)(iv)</i>		
v. Dividends? 620.5(f)(1)(iv)(A)		
w. Patronage refunds, including		

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<ul style="list-style-type: none"> • Cash? • Stock? • Allocated surplus? 620.5(f)(1)(iv)(B) 		
<p>37. <i>For all banks (on a bank-only basis), did the report furnish in comparative columnar form for each of the last 5 fiscal years the following financial data, if material:</i></p> <p><i>Note: For the ratios in rows b thru e below, banks do not need to report data for fiscal years ending in 2016 and prior.</i></p>		
a. Permanent capital ratio? 620.5(f)(2)(i)		
b. CET1 capital ratio? 620.5(f)(2)(ii)		
c. Tier 1 capital ratio? 620.5(f)(2)(iii)		
d. Total capital ratio? 620.5(f)(2)(iv)		
e. Tier 1 leverage ratio? 620.5(f)(2)(v)		
<p>38. <i>For all associations, did the report furnish in comparative columnar form for each of the last 5 fiscal years the following financial data, if material:</i></p> <p><i>Note: For the ratios in rows b thru e below, associations do not need to report data for fiscal years ending in 2016 and prior.</i></p>		
a. Permanent capital ratio? 620.5(f)(3)(i)		
b. CET1 capital ratio? 620.5(f)(3)(ii)		
c. Tier 1 capital ratio? 620.5(f)(3)(iii)		
d. Total capital ratio? 620.5(f)(3)(iv)		
e. Tier 1 leverage ratio? 620.5(f)(3)(v)		
Management's Discussion and Analysis of Financial Condition and Results of Operations		
<p>39. Did the report fully discuss any material aspects of the institution's financial condition, changes in financial condition, and results of operations during the last 2 fiscal years, identifying favorable and unfavorable trends, and significant events or uncertainties? 620.5(g)</p>		
<p>40. Did the report provide such other information as is necessary to an understanding of the institution's financial condition, changes in financial condition, and results of operations? 620.5(g)</p> <p><i>Note: An example of other information could be involvement in a capitalized participation pool (CPP) program. If the institution has material involvement in a CPP program, the discussion on financial condition, changes in financial condition, and results of operations should provide information to help readers understand how the CPP program impacts these areas. For example, disclosures should describe the amount of earnings generated by this program, and for</i></p>		

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Question	Response	Comment
<i>associations, state that patronage refunds from this program are under the bank's control and discretion.</i>		
41. Did the report describe the types of loans in the portfolio by major category (e.g., agricultural real estate mortgage loans, rural home loans, agricultural production loans, processing and marketing loans, farm business loans, and international loans), indicating the approximate percentage of the total dollar portfolio represented by each major category? 620.5(g)(1)(i)		
42. <i>For associations that make agricultural production loans</i> , did the report:		
a. Provide the information required for such loans including the major subcategories when discussing types of loans (e.g., cash grains, field crops, livestock, dairy, poultry, and timber)? 620.5(g)(1)(i)		
b. Discuss any special features of the loans for each category and subcategory that may be material to the evaluation of risk and any economic or business conditions that have had or are likely to have a material impact on their collectability? 620.5(g)(1)(i)		
43. <i>For banks</i> , does the report disclose separately the aggregate amount of loans outstanding to related associations and other financing institutions? 620.5(g)(1)(i)		
44. Did the report describe the geographic distribution of the loan portfolio by State or other significant geographic division, if any? 620.5(g)(1)(ii)		
45. Did the report describe any material participation in the Federal Agricultural Mortgage Corporation program or origination of loans for resale? 620.5(g)(1)(iii)(A)		
46. Did the report disclose the amount of the following: <ul style="list-style-type: none"> • purchased loans, • loans sold with recourse, • retained subordinated participation interests in loans sold, and • interests in pools of subordinated participation interests that are held in lieu of retaining a subordinated participation interest in the loans sold? 620.5(g)(1)(iii)(B) 		
47. Do the periods covered by the financial statements provide:		
a. An analysis of high-risk assets and loan performance categories, to include, but not limited to, a discussion of the nature and extent of significant potential credit risks within the loan portfolio, or other information that could adversely impact performance of the loan portfolio in the near future? 620.5(g)(1)(iv)(A)		

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<p>b. An analysis of the allowance for credit losses that includes the ratios of the allowance for credit losses to loans and net chargeoffs to average loans, and a discussion of the adequacy of the allowance for credit losses given reasonable and supportable forecasts? 620.5(g)(1)(iv)(B)</p>		
<p>c. Financial assistance given or received under districtwide or Systemwide loss-sharing or capital preservation agreements or otherwise? 620.5(g)(1)(iv)(C)</p>		
<p>d. <i>For banks</i>, a description in the aggregate of the recent loss experience of related associations that are its shareholders, including items (a), (b), and (c) (above)? 620.5(g)(1)(iv)(D)</p>		
<p>e. A description of any material obligations with respect to loans sold and the amount of any material contributions made in connection with loans sold into the secondary market? 620.5(g)(1)(iv)(E)</p>		
<p>f. The amount of risk of loss associated with such obligations in 47e (above) and the amount included in the allowance for credit losses to provide for such risk? 620.5(g)(1)(iv)(E)</p>		
<p>48. Did the report describe, on a comparative basis, changes in the major components of net interest income during the last 2 fiscal years, describing significant factors that contributed to the changes and quantifying the amount of change(s) due to an increase in volume or the introduction of new services and the amount due to changes in interest rates earned and paid, based on averages for each period? 620.5(g)(2)(i)</p>		
<p>49. Did the report describe any unusual or infrequent events or transactions or any significant economic changes, including, but not limited to, financial assistance received or paid that materially affected reported income? 620.5(g)(2)(ii)</p> <p><i>Note: If anything was reported under this, then the report should indicate the extent to which income was affected in each case.</i></p>		
<p>50. Did the report discuss the factors underlying the material changes, if any, in the following items:</p> <ul style="list-style-type: none"> • return on average assets, • return on average protected borrower capital and at-risk capital, and • permanent capital ratio? 620.5(g)(2)(iii) <p><i>Note: An explanation of the basis of the calculation of ratios relating to permanent capital and at-risk capital must be included.</i></p>		

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51. Did the report describe, on a comparative basis, the major components of operating expense, indicating the reasons for significant increases or decreases? 620.5(g)(2)(iv)		
52. Did the report describe any other significant components of income or expense, including, but not limited to, income from investments, that should be described in order to understand the institution's results of operations? 620.5(g)(2)(v)		
53. Did the report discuss any events affecting a related organization that are likely to have a material effect on the reporting institution's financial condition, results of operations, cost of funds, or reliability of sources of funds? 620.5(g)(2)(vi)		
54. Did the report describe any known trends or uncertainties that have had, or that the institution reasonably expects will have, a material impact on net interest income or net income? 620.5(g)(2)(vii)		
55. Did the report disclose any events known to management that will cause a material change in the relationship between costs and revenues? 620.5(g)(2)(vii)		
56. Did the report describe the average and yearend amounts, maturities, and interest rates on outstanding consolidated System-wide debt obligations, bond obligations, or any other obligations used to fund the institution's lending operations? 620.5(g)(3)(i)(A)		
57. Did the report describe existing lines of credit and their terms? 620.5(g)(3)(i)(B)		
58. Did the report describe the institution's capital accounts and other sources of lendable funds? 620.5(g)(3)(i)(C)		
59. Did the report discuss the institution's liquidity policy and the components of asset liquidity, including, but not limited to, cash, investment securities, and maturing loan repayments? 620.5(g)(3)(ii)(A)		
60. Did the report assess the ability of the institution to generate adequate amounts of cash to fund its operations and meet its obligations? 620.5(g)(3)(ii)(A)		
61. Did the report discuss any known trends that are likely to result in a liquidity deficiency and the course of action management intends to take to resolve it? 620.5(g)(3)(ii)(B)		
62. Did the report discuss any material increase or decrease in liquidity that is likely to occur? 620.5(g)(3)(ii)(B)		
63. Did the report discuss the institution's participation in the Federal Agricultural Mortgage Corporation secondary market programs authorized by title VIII of the Act and the origination of loans for resale under other authorities, <i>if any</i> ? 620.5(g)(3)(ii)(C)		

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Question	Response	Comment
<p>64. Did the report discuss the institution's interest rate programs and the institution's ability to control interest rate margins? 620.5(g)(3)(iii)(A)</p> <p><i>Note: FCA Bookletter BL-074 includes direction for disclosure responsibilities related to wholesale funding arrangements and its impact on interest rate risk management.</i></p>		
<p>65. Did the report discuss changes in net interest margin (net interest income as a percentage of average earning assets), explaining the reasons therefor? 620.5(g)(3)(iii)(B)</p>		
<p>66. Did the report describe any material commitments to purchase capital assets and the anticipated sources of funding? 620.5(g)(4)(i)</p>		
<p>67. Did the report describe any material trends or changes in the mix and cost of debt and capital resources? 620.5(g)(4)(ii)</p> <p><i>Note: The discussion must consider changes in permanent capital, CET1 capital, tier 1 capital, total capital, the tier 1 leverage ratio, debt, and any off-balance-sheet financial arrangements.</i></p>		
<p>68. Did the report describe any favorable or unfavorable trends in the institution's capital resources? 620.5(g)(4)(iii)</p>		
<p>69. Did the report discuss and explain any material changes in capital ratios, noting any material adverse variances from regulatory guidelines? 620.5(g)(4)(iv)</p>		
<p>70. Did the report discuss the adequacy of the current capital position and any material changes in the capital plan, to the extent that such changes may have an effect on the institution's minimum stock purchase requirements and its ability to retire stock and distribute earnings? 620.5(g)(4)(v)</p>		
<p>71. Did the report discuss any trends, commitments, contingencies, or events that are reasonably likely to have a materially adverse effect upon the institution's ability to meet the regulatory minimum capital standards and capital adequacy requirements? 620.5(g)(4)(vi)</p>		
<p>Relationship with Qualified Public Accountant</p>		
<p>72. If there was a change in accountants since the last annual report or if there was a disagreement with the public accountant, was the following information disclosed: 620.5(i)(1), 621.4</p>		
<p>a. <i>If there was a change in the accountant</i>, did the report include:</p> <ul style="list-style-type: none"> • The name and address of the accountant whose opinion appeared in the institution's most recent annual report to shareholders? 621.4(d)(1) 		

Annual Report to Shareholders

Question	Response	Comment
<ul style="list-style-type: none"> • A brief but thorough statement of the reasons the accountant selected for the most recent annual report was not selected for the current annual report? 621.4(d)(2) • The identification of the highest ranking officer, committee of officers, or board of directors, as appropriate, that recommended, approved, or otherwise made the decision to change qualified public accountants? 621.4(d)(3) <p><i>Note: 621.4(d) contains additional requirements outside the annual report disclosure above that institutions must comply with if there is a change in accountants.</i></p>		
<p>b. <u><i>If there was disagreement with the accountant's opinion</i></u>, did the report include a final description of the disagreement and the accountant's final response directly following the accountant's opinion of the institution's financial statements? 620.5(i)(1); 621.4(c)</p> <p><i>Note: 621.4(c) contains additional requirements outside the annual report disclosure above that institutions must comply with if there is a disagreement with the accountant's opinion.</i></p>		
<p>73. Does the report disclose the total fees, by the category of services provided, paid during the reporting period to the qualified public accountant engaged to conduct the institution's financial statement audit? 620.5(i)(2)</p> <p><i>Note: This applies to every annual report prepared, including those issued on a combined district level. Such reports are to be prepared according to GAAP and in a manner providing meaningful disclosures to shareholders. Within the combined district level report, the disclosure of external auditor fees paid to the qualified public accountant/ accounting firm engaged by the reporting institution (i.e., for the combined reports, the bank) would include audit and non-audit fees paid by any related association during the reporting period <u>to that same external auditor</u>.</i></p>		
<p>74. Does the report identify, at a minimum, fees paid to the public accountant for audit services, tax services, and non-audit related services? 620.5(i)(2)</p> <p><i>Note: The types of non-audit services must be identified and indicate audit committee approval of the services. If the accountant auditing the financial statements is also performing a non-audit service, one responsibility of the audit committee is to approve that service – regardless of the cost of the service – since the audit committee is then accountable for ensuring there are no conflicts of interest between the service being performed and that same accountant issuing an opinion on the financial statements. Refer to 621.31 for additional criteria on non-audit services.</i></p>		

Annual Report to Shareholders

Question	Response	Comment
Financial Statements		
75. Did the report include financial statements and related footnotes that were prepared in accordance with GAAP and instructions and other requirements of the Farm Credit Administration and that were audited in accordance with generally accepted auditing standards by a qualified public accountant and an opinion expressed thereon? 620.5(j)(1)		
76. Did financial statements contained in the report include the following statements and related footnotes for the last 3 fiscal years: <ul style="list-style-type: none"> • Balance sheet, • Statement of income, • Statement of changes in protected borrower capital and at-risk capital, and • Statement of cash flows? 620.5(j)(1) 		
77. Does the report state that the financial statements were prepared under the oversight of the audit committee, identifying the members of the audit committee? 620.5(j)(2)		
Credit and Services to Young, Beginning, and Small Farmers and Ranchers and Producers or Harvesters of Aquatic Products		
78. <i>For direct lender associations</i> , does the report describe the YBS demographics in its territory and the source of the demographic data? 620.5(k)(1) <i>Note: If there are differences in the methods by which the demographic and YBS data are presented, these differences must be described.</i>		
79. <i>For direct lender associations</i> , does the report provide a description of its YBS program, including a status report on each of the items required by 614.4165(c) ? 620.5(k)(2) <i>Note: The discussion must provide such other information necessary for a comprehensive understanding of the YBS program and its results.</i>		
80. <i>For direct lender associations</i> , does the report provide the definitions of "young," "beginning," and "small" farmers and ranchers? 620.5(k)(2)		
81. <i>For banks</i> , did the report include a summary report of the quantitative YBS data from its affiliated direct lender associations as described in FCA's instructions for the annual YBS yearend report? 620.5(k)(3) <i>Note: The report must include the definitions of "young," "beginning," and "small" farmers and ranchers. A narrative report may be necessary for an ample understanding of the YBS mission results.</i>		

Annual Report to Shareholders

Director and Senior Officer Disclosures

This workpaper focuses on examining the compensation disclosures within the annual report as required by FCA Regulations. Other aspects of compensation and benefits administration, such as Compensation Committee activities and board, management, and staff compensation programs and practices, are examined within the “Compensation & Benefits” group of procedures in the Human Capital Management topic.

Question	Response	Comment
<p>82. Did the report list the names of all directors and senior officers of the institution, indicating the position title and term of office of each director, and the position, title, and date each senior officer commenced employment in his or her current position? 620.6(a)(1)</p>		
<p>83. Did the report briefly describe the business experience during the past 5 years of each director and senior officer, including each person’s principal occupation and employment during the past 5 years? 620.6(a)(2)</p> <p><i>Note: If the person’s principal occupation and employment involves multiple, closely-related entities (i.e., corporation, LLC, etc.) and these entities do not engage in business unrelated to the person’s principal occupation and employment, a complete listing of entities is not required if shareholders are provided sufficient information to understand the person’s principal occupation and employment.</i></p>		
<p>84. Did the report list any other business interest where the director or senior officer serves on the board of directors or as a senior officer, including the position held, and the principal type of business? 620.6(a)(3)</p> <p><i>Note: “Other business interests” include both non-farm and farming-related entities that are not part of the person’s principal occupation and employment disclosed in row 83 above. To ensure full disclosure, the institution should include as “other business interests” entities where the person is on the board, is a senior officer, or could be viewed as equivalent to being a senior officer or board member.</i></p>		
<p>85. Did the report describe the arrangements under which directors of the institution are compensated for all services as a director (including total cash compensation and noncash compensation)? 620.6(b)</p> <p><i>Note: Noncash compensation with an annual aggregate value of less than \$5,000 does not have to be reported.</i></p>		
<p>86. Did the report state the total cash and reportable noncash compensation paid to all directors as a group during the last fiscal year? 620.6(b)</p>		
<p>87. <i>For banks, if applicable</i>, did the report describe the exceptional circumstances used to justify additional compensation given under 611.400(c), which allows institutions to pay up to 30 percent more than the statutory bank director salary limit for</p>		

Annual Report to Shareholders

Question	Response	Comment
<p>extraordinary time and effort in the service of the bank and its shareholders? 620.6(b)</p> <p><i>Note: This question is no longer applicable as the statutory bank director salary limit was repealed effective December 20, 2018. See the FCA Informational Memorandum dated January 22, 2019 for details.</i></p>		
<p>88. For each director, did the report state:</p> <p><i>Note 1: Compensation paid to and days served by directors applies to any director who served in that capacity at any time during the reporting period.</i></p> <p><i>Note 2: Reportable days (either at a board meeting or other official activity) relate to days acting as a director of the institution and receiving compensation for such days. This disclosure is specific to compensation paid to a director when acting as a director, not for activities when the person is acting as a candidate for re-election or as a shareholder.</i></p>		
<p>a. The number of days served at board meetings? 620.6(b)(1)</p>		
<p>b. The total number of days served in other official activities, including any board committee(s)? 620.6(b)(2)</p>		
<p>c. Any additional compensation paid for service on a board committee, naming the committee? 620.6(b)(3)</p>		
<p>d. The total cash and noncash compensation paid to each director during the last fiscal year? 620.6(b)(4)</p> <p><i>Note: Reportable compensation includes cash and the value of noncash items provided by a third party to a director for services rendered by the director on behalf of the reporting Farm Credit institution. Noncash compensation with an annual aggregate value of less than \$5,000 does not have to be reported.</i></p>		
<p>89. Did the report disclose the total amount of compensation paid to senior officers for the past three years in substantially the same manner as the tabular form specified in the Summary Compensation Table? 620.6(c)(3)</p> <p><i>Note: Associations may disclose information on compensation paid to senior officers (rows 89 through 98 of this workpaper) in the Annual Meeting Information Statement (AMIS) instead of the annual report. Refer to row 99 for related requirements. 620.6(c)(6)</i></p>		

Annual Report to Shareholders

Question	Response	Comment																																																								
<p>Summary Compensation Table</p> <table border="1" style="width: 100%; border-collapse: collapse; margin: 0 auto;"> <thead> <tr> <th colspan="7" style="text-align: center;">Annual</th> </tr> <tr> <th style="width: 25%;">Name of individual or number in group</th> <th style="width: 10%;">Year</th> <th style="width: 10%;">Salary</th> <th style="width: 10%;">Bonus</th> <th style="width: 10%;">Deferred/perquisite</th> <th style="width: 10%;">Other</th> <th style="width: 10%;">Total</th> </tr> <tr> <th style="text-align: center;">(a)</th> <th style="text-align: center;">(b)</th> <th style="text-align: center;">(c)</th> <th style="text-align: center;">(d)</th> <th style="text-align: center;">(e)</th> <th style="text-align: center;">(f)</th> <th style="text-align: center;">(g)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">CEO</td> <td style="text-align: center;">20XX 20XX 20XX</td> <td style="text-align: center;">\$</td> <td style="text-align: center;">\$</td> <td style="text-align: center;">\$</td> <td style="text-align: center;">\$</td> <td style="text-align: center;">\$</td> </tr> <tr> <td style="text-align: center;"> Aggregate No. of Senior Officers (& other highly compensated employees, if applicable) </td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td style="text-align: center;">(X)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td style="text-align: center;">(X)</td> <td style="text-align: center;">20XX</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td style="text-align: center;">(X)</td> <td style="text-align: center;">20XX 20XX</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>			Annual							Name of individual or number in group	Year	Salary	Bonus	Deferred/perquisite	Other	Total	(a)	(b)	(c)	(d)	(e)	(f)	(g)	CEO	20XX 20XX 20XX	\$	\$	\$	\$	\$	Aggregate No. of Senior Officers (& other highly compensated employees, if applicable)							(X)							(X)	20XX						(X)	20XX 20XX					
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<p>90. For each of the last 3 completed fiscal years, did the institution report the total amount of compensation paid and the amount of each component of compensation paid to the institution's chief executive officer (CEO), naming the individual? 620.6(c)(1)</p> <p><i>Note: If more than one person served in the capacity of CEO during any given fiscal year, individual compensation disclosures must be provided for each CEO.</i></p>																																																										
<p>91. For each of the last 3 completed fiscal years, did the institution report the aggregate amount of compensation paid, and the components of compensation paid, to all senior officers as a group, stating the number of officers in the group without naming them? 620.6(c)(2)</p> <p><i>Note: While not a regulatory requirement, the CEO should not be included in the senior officer group as the CEO has a separate line entry (see Governance FAQ #48). If an institution includes the CEO in the aggregate, the report must so state so as to make the disclosure clear and not misleading under 620.3(a).</i></p>																																																										
<p>92. If applicable, when any employee who is not a senior officer had annual compensation at a level that was among the five highest paid by the institution during the reporting period, did the report include the highly compensated employee(s) in the aggregate number and amount of compensation reported in the Compensation Table? 620.6(c)(2)(i)</p>																																																										

Annual Report to Shareholders

Question	Response	Comment
<p><i>Exception: Institutions are to exclude any such employee from the Summary Compensation Table if the employee would be considered a “highly compensated employee” solely because of payments related to or change(s) in value of the employee’s qualified pension plan provided that the plan was available to all similarly situated employees on the same basis at the time the employee joined the plan.</i></p> <p><i>Note: Institutions should use the amount that would be reported in the “total” column to determine if an employee is among the 5 most highly compensated or not.</i></p>		
<p>93. Did the report include a statement that disclosure of information on the total compensation paid during the last fiscal year to any senior officer, or to any other employee included in the aggregate, is available and will be disclosed to shareholders of the institution and shareholders of related associations (if applicable) upon request? 620.6(c)(2)(ii)</p> <p><i>Note: This statement is required by regulation to be located directly beneath the Compensation Table.</i></p>		
<p>94. In the Summary Compensation Table:</p>		
<p>a. Do the amounts shown as “Salary” (column (c)) and “Bonus” (column (d)) reflect the dollar value of salary and bonus earned by the senior officer during the fiscal year? 620.6(c)(3)(i)</p> <p><i>Note: Amounts contributed during the fiscal year by the senior officer pursuant to a plan established under section 401(k) of the Internal Revenue Code, or similar plan, must be included in the salary column or bonus column, as appropriate. If the amount of salary or bonus earned during the fiscal year is not calculable by the time the report is prepared, the reporting institution must provide its best estimate of the compensation amount(s) and disclose that fact in a footnote to the table.</i></p>		
<p>b. Do the amounts shown as “deferred/perquisites” (column (e)) reflect the dollar value of other annual compensation not properly categorized as salary or bonus, including but not limited to:</p> <ul style="list-style-type: none"> • Deferred compensation earned during the fiscal year, whether or not paid in cash, and • Perquisites and other personal benefits, including the value of noncash items, unless the annual aggregate value of such perquisites is less than \$5,000? 620.6(c)(3)(ii) <p><i>Note: Reportable perquisites include cash and the value of noncash items provided by a third party to a senior officer for</i></p>		

Annual Report to Shareholders

Question	Response	Comment
<p><i>services rendered by the officer on behalf of the reporting institution.</i></p>		
<p>c. Do the compensation amounts reported under the category “Other” (column (f)) reflect the dollar value of all other compensation not properly reportable in any other column? 620.6(c)(3)(iii)</p> <p><i>Note 1: Items reported in this column must be specifically identified and described in a footnote to the table.</i></p> <p><i>Note 2: Other compensation includes but is not limited to:</i></p> <ul style="list-style-type: none"> • <i>The amount paid to the senior officer pursuant to a plan or arrangement in connection with the resignation, retirement, or termination of such officer’s employment with the institution;</i> • <i>The amount of contributions by the institution on behalf of the senior officer to a vested or unvested defined contribution plan unless the plan is made available to all employees on the same basis;</i> • <i>The dollar value of any tax reimbursement provided by the institution; and</i> • <i>Any changes in the value of pension benefits</i> 		
<p>d. Do the amounts displayed under “Total” (column (g)) reflect the sum total of amounts reported in columns (c), (d), (e), and (f)? 620.6(c)(3)(iv)</p>		
<p>95. <u><i>If the institution provides a defined benefit plan or a supplemental executive retirement plan (SERP) to its senior officers,</i></u> did the institution complete the following Pension Benefits Table, or something substantially similar, for each plan? 620.6(c)(4)</p> <p><i>Note: Refer to 619.9335 for a definition of an SERP.</i></p>		

Pension Benefits Table

As of most recent fiscal year-end			
Name of individual	Years of credited service	Present value of accumulated benefits	Payments made during reporting period
CEO		\$	\$
Senior Officers as a Group (& other highly compensated employees, if applicable)			

Annual Report to Shareholders

Question	Response	Comment
96. In the Pension Benefits Table, did the institution:		
<p>a. Report the credited years of service for the CEO and the average credited years of service for the senior officer group under the plan? 620.6(c)(4)(i)</p>		
<p>b. Report the present value of accumulated benefits for the CEO and the senior officer group under the plan? 620.6(c)(4)(ii)</p>		
<p>c. Report payments made during the reporting period under the plan for the CEO and the senior officer group? 620.6(c)(4)(iii)</p>		
<p>97. Did the report provide a description of all compensation, retirement, incentive, and performance plans pursuant to which cash or noncash compensation was paid or distributed during the last fiscal year, or is proposed to be paid or distributed in the future for performance during the last fiscal year, to those individuals included in the Compensation Table? 620.6(c)(5)</p> <p><i>Note: The information must be provided individually for the chief executive officer and as a group for the senior officers. Information provided for the senior officer group includes any highly compensated employees whose compensation is reported in the Compensation Table.</i></p>		
98. Did each plan's description, at a minimum, include:		
<p>a. A summary of how each plan operates and who is covered by the plan? 620.6(c)(5)(i)</p> <p><i>Note: The summary must include the criteria used to determine amounts payable, including any performance formula or measure, as well as the time period over which the measurement of compensation will be determined, payment schedules, and any material amendments to the plan during the last fiscal year.</i></p>		
<p>b. The overall risk and reward structure of the plan as it relates to senior officers' compensation? 620.6(c)(5)(ii)</p> <p><i>Note: The description must include, at a minimum, how each plan is compatible with and promotes the institution's goals and business strategy and the mission as a Government-sponsored enterprise.</i></p>		
<p>c. A discussion of the relationship between the CEO and senior officers' compensation to the reporting institution's overall performance? 620.6(c)(5)(iii)</p> <p><i>Note: The disclosure must also discuss the relationship between the CEO's and senior officers' compensation to their performance.</i></p>		

Annual Report to Shareholders

Question	Response	Comment
99. <i>For associations that disclosed the compensation of senior officers in the AMIS</i> , did the annual report include a reference stating that the senior officer compensation information is included in the AMIS and that the AMIS is available for public inspection at the reporting association offices? 620.6(c)(6)		
100. Did the report briefly describe the institution’s policy addressing reimbursements for travel, subsistence, and other related expenses as it applies to directors and senior officers? 620.6(d)(1)		
101. Did the report include a statement that a copy of the policy is available to shareholders of the institution and shareholders of related associations (if applicable) upon request? 620.6(d)(1)		
102. Did the report state the aggregate amount of reimbursement for travel, subsistence, and other related expenses for all directors as a group for each of the last 3 fiscal years? 620.6(d)(2)		
103. Did the report state the institution’s policies, if any, on loans to and transactions with officers and directors of the institution? 620.6(e)(1)		
104. Did the report briefly describe any transaction or series of transactions other than loans that occurred at any time since the last annual meeting between the institution and a senior officer or director, any member of their immediate family, or any organization with which they are affiliated? 620.6(e)(2) <i>Note: This applies to senior officers or directors as of January 1 of the year following the fiscal year of which the report is filed or those in place at any time during the fiscal year just ended.</i>		
105. For transactions (from #104 above) relating to the purchase or retirement of preferred stock issued by the institution, did the report state: <ul style="list-style-type: none"> • The name of each senior officer or director that held preferred stock issued by the institution during the reporting period, • The current amount of preferred stock held by the senior officer or director, • The average dividend rate on the preferred stock currently held, and • The amount of purchases and retirements by the individual during the reporting period? 620.6(e)(2)(i) 		
106. For all other transactions (relating to #104 above), did the report state: <ul style="list-style-type: none"> • The name of the senior officer or director who entered into the transaction or whose immediate family member or affiliated organization entered into the transaction, and 		

Annual Report to Shareholders

Question	Response	Comment
<ul style="list-style-type: none"> • The nature of the person’s interest in the transaction, and the terms of the transaction? 620.6(e)(2)(ii) <p><i>Note: No information need be given where the purchase price, fees, or charges involved were determined by competitive bidding or where the amount involved in the transaction (including the total of all periodic payments) does not exceed \$5,000, or the interest of the person arises solely as a result of his or her status as a stockholder of the institution and the benefit received is not a special or extra benefit not available to all stockholders.</i></p>		
<p>107. To the extent applicable, did the report state that the institution (or in the case of an association that does not carry loans to its senior officers and directors on its books, its related bank) has had loans outstanding during the last full fiscal year to date to its senior officers and directors, their immediate family members, and any organizations with which such senior officers or directors are affiliated that:</p>		
<p>a. Were made in the ordinary course of business? 620.6(e)(3)(i)(A)</p>		
<p>b. Were made on the same terms, including interest rate, amortization schedule, and collateral, as those prevailing at the time for comparable transactions with other persons? 620.6(e)(3)(i)(B)</p>		
<p>108. To the extent applicable, did the report state that no loan to a senior officer or director, or to any organization affiliated with such person, or to any immediate family member who resides in the same household as such person or in whose loan or business operation such person has a material financial or legal interest, involved more than the normal risk of collectability; provided that no such statement need be made with respect to any director or senior officer who has resigned before the time for filing the applicable report with the Farm Credit Administration (but in no case later than the actual filing), or whose term of office will expire or terminate no later than the date of the meeting of stockholders to which the report relates? 620.6(e)(3)(ii)</p> <p><i>Note: Normal risk of collectability is defined in 620.1. When evaluating risk of collectability on an account with a guarantee of collection (e.g., the typical FSA guarantee), institutions should not consider the guarantee. The guarantee will limit the loss potential on an account, but does not alter the borrower’s performance on the account.</i></p>		
<p>109. <i>If the above loans</i> involved more than the normal risk of collectability or they were not made in the ordinary course of business and under the same terms (interest rate, amortization, and collateral) as comparable transactions at the time, did the report state:</p>		

Annual Report to Shareholders

Question	Response	Comment
a. The name of the officer or director to whom the loan was made or to who's relative or affiliated organization the loan was made? 620.6(e)(3)(iii)(A)		
b. The largest aggregate amount of each indebtedness outstanding at any time during the last fiscal year? 620.6(e)(3)(iii)(B)		
c. The nature of the loan(s)? 620.6(e)(3)(iii)(C)		
d. The amount outstanding as of the latest practicable date? 620.6(e)(3)(iii)(D)		
e. The reasons the loan does not comply with the criteria contained in paragraphs (e)(3)(i) (under the same terms) or (e)(3)(ii) (more than the normal risk of collectability) of this section? 620.6(e)(3)(iii)(E)		
f. <i>If the loan was not made under the same terms as comparable transactions at the time (620.6(e)(3)(i)(B)),</i> the rate of interest payable on the loan and the repayment terms? 620.6(e)(3)(iii)(F)		
g. <i>If the loan was deemed to involve more than the normal risk of collectability,</i> the amount past due, if any, and the reason the loan is deemed to involve more than a normal risk of collectability? 620.6(e)(3)(iii)(G)		
<p>110. Did the report describe any of the following events that occurred during the past 5 years and that are material to an evaluation of the ability or integrity of any person who served as director or senior officer on January 1 of the year following the fiscal year for which the report is filed or at any time during the fiscal year just ended:</p> <ul style="list-style-type: none"> • A petition under the Federal bankruptcy laws or any State insolvency law was filed by or against, or a receiver, fiscal agent, or similar officer was appointed by a court for the business or property of such person, or any partnership in which such person was a general partner at or within 2 years before the time of such filing, or any corporation or business association of which such person was a senior officer at or within 2 years before the time of such filing? 620.6(f)(1) • Such person was convicted in a criminal proceeding or is a named party in a pending criminal proceeding (excluding traffic violations and other misdemeanors)? 620.6(f)(2) • Such person was the subject of any order, judgment, or decree, not subsequently reversed, suspended, or vacated, by any court of competent jurisdiction, 		

Annual Report to Shareholders

Question	Response	Comment
<p>permanently or temporarily enjoining or otherwise limiting such person from engaging in any type of business practice? 620.6(f)(3)</p>		
<p>111. In addition to the information specified in 620.5 and 620.6 (as covered above), did the report contain all other information as is necessary to make all the required statements, in light of the circumstances under which they are made, not misleading? 620.4(c)</p> <p><i>Note 1: When completing this question, determine whether there are any items not already covered in prior rows of this workpaper that warrant disclosure to ensure the report is not misleading.</i></p> <p><i>Note 2: FCA regulations do not prohibit institutions from providing additional information beyond what is required as long as that information is not misleading (as required by 620.3(a)).</i></p>		

Bank Capital Disclosures

Question	Response	Comment
<p>112. <i>For banks</i>, did the report include the disclosures described in Tables 1 through 10 of 628.63? 628.62(a), 628.63(a)</p> <p><i>Note 1: Pursuant to 628.62(a), the bank need not make the disclosures in the format set out in the applicable tables or all in the same location in a report, as long as a summary table specifically indicating the location(s) of all such disclosures is provided.</i></p> <p><i>If a significant change occurs, such that the most recent reported amounts are no longer reflective of the bank's capital adequacy and risk profile, then a brief discussion of this change and its likely impact must be disclosed as soon as practicable. This disclosure requirement may be satisfied by providing a notice under 620.15, which requires notice within 90 days of the change.</i></p> <p><i>Qualitative disclosures that typically do not change each quarter (for example, a general summary of the bank's risk management objectives and policies, reporting system, and definitions) may be disclosed annually after the end of the 4th calendar quarter, provided any significant changes are disclosed in the interim.</i></p> <p><i>Note 2: Pursuant to 628.62(c), if a bank concludes that disclosure of specific proprietary or confidential commercial or financial information that it would otherwise be required to disclose under this section would compromise its position, then the bank is not required to disclose that specific information pursuant to this section, but must disclose more general information about the subject matter of the requirement, together with the fact that, and the reason why, the specific items of information have not been disclosed. This applies to Tables 1 through 10 of 628.63.</i></p>		

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<p><i>Note 3: Bookletter BL-074 discusses disclosure considerations for banks relating to wholesale funding arrangements within the district. Disclosures for Table 10 may need adjustment to appropriately capture bank IRR exposures arising from wholesale funding activities (see section 7 on Disclosure Responsibilities).</i></p>		
<p>113. <u>For banks</u>, did the report disclose the following items:</p> <ul style="list-style-type: none"> • CET1 capital, tier 1 capital, and total (regulatory) capital, including all the regulatory capital elements and all the regulatory adjustments and deductions needed to calculate the numerator of such ratios? 628.63(b)(1) • Total risk-weighted assets, including the different regulatory adjustments and deductions needed to calculate total risk-weighted assets? 628.63(b)(2) • A reconciliation of regulatory capital elements as they relate to its balance sheet in any audited consolidated financial statements? 628.63(b)(4) <p><i>Note 1: 628.63(b)(3) does not apply as there is no transition period on the regulatory capital ratios.</i></p> <p><i>Note 2: Banks must complete the reconciliation using the most recent audited financial statements.</i></p> <p><i>Note 3: The disclosures required by 628.63(b) are separate from, and in addition to, the disclosures described in Tables 1 through 10 of 628.63.</i></p>		

Other Comments:

This workpaper is not intended to create any rights, substantive or procedural, enforceable at law or in any administrative proceeding. While the workpaper was carefully reviewed for applicability and accuracy, changes may occur in the wording or interpretation of laws and regulations. If a situation arises where the workpaper becomes inconsistent with applicable laws or regulations, the requirement of the laws or regulations will prevail. Examination scope may vary between institutions. On a particular examination activity, the workpaper may not pertain to all factual situations or interpretations, additional concerns or issues may be addressed that are not covered in the workpaper, and some portions of the workpaper may not be used.