MINORITY AND WOMEN INCLUSION POLICY

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Policy Information

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Introduction

In accordance with 12 C.F.R. 1223.21(b) and 12 USC 4520, this Policy is established to promote, to the maximum extent possible, in balance with financially safe and sound business practices, the inclusion and utilization of Minorities, women, Individuals with Disabilities, and Minority-, Women-, and Disabled-Owned Businesses in FHLBank's business and activities. The Federal Housing Finance Agency (FHFA) regulations pertaining to Minority and Women Inclusion (MWI) at 12 C.F.R. Part 1223, as amended from time to time, are incorporated as part of this Policy.

Purpose

The purpose of this Policy is to provide guidance related to the requirements of the MWI regulations. In addition, this MWI Policy promotes adherence to the principles of equal opportunity and non-discrimination in FHLBank's business activities, including employment and contracting.

Scope

This Policy applies to all FHLBank business partners and all aspects of FHLBank's operations.

Definitions

The following definitions are derived from the FHFA regulations pertaining to MWI at 12 C.F.R. 1223.1.

Applicant refers to an individual who submits an expression of interest in employment in conjunction with all of the following: (1) FHLBank acted to fill a particular position; (2) the individual followed FHLBank's standard process for submitting an application; (3) the individual's expression of interest indicates that the individual possesses the basic qualifications for the position, as determined by the People, Culture and Development (PCD) department; and (4) the individual has not removed themself from consideration or otherwise indicated that they are no longer interested in the position.

Business Activities refers to operational, commercial, and economic endeavors of any kind, whether for profit or not for profit and whether regulatory or irregularly engaged in by FHLBank, and includes, but is not limited to, management of FHLBank, employment, procurement, insurance, and all types of contracts, including contracts for the issuance or guarantee of any debt, equity, or mortgage-related securities, the management of mortgage and securities portfolios, the making of equity investments, the purchase sale and servicing of single- and multi-family mortgage loans and the implementation of affordable housing or community investment programs and initiatives.

Disabled-Owned Businesses include those: (1) that qualify as a Service-Disabled Veteran-Owned Small Business Concern in accordance with Small Business Administration regulation; or (2) where: (a) more than fifty percent of the ownership or control of which is held, directly or indirectly, by one or more persons with a disability; and (b) more than fifty percent of the net profit or loss of which accrues to one or more persons with a disability.

Disability refers to a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is perceived by others as having such an impairment.

Diversity Spend with Non-diverse-owned Businesses means the dollar amount(s) paid by FHLBank to a Prime Contractor that is not a Minority-, Women-, or Disabled-owned business for professional services (i.e., the amount paid for work performed, as may be adjusted, in connection with providing legal, accounting, or other professional or consulting services) provided by or allocated to a partner, member, or other equity owner who is a Minority, woman, or an Individual with a Disability.

Minority means any Black or African American, Native American, Hispanic or Latino American or Asian American.

Minority-Owned Business means a business where more than fifty percent of the: (1) ownership or control is held, directly or indirectly, by one or more Minority individuals; and (2) net profit or loss accrues to one or more Minority individuals.

*Prime Contractor (Tier I) m*eans a supplier that enters into a contract with FHLBank to provide goods and/or services directly to it.

Promotion means the advancement of a business partner within FHLBank and may be the result of a business partner's proactive pursuit of a higher job ranking or a reward for good performance. A promotion is typically associated with an increase in a business partner's pay due to additional or enhanced job responsibilities.

Subcontractor (Tier II) means a supplier that enters into a contract with a Prime Contractor (Tier I) of FHLBank to provide goods and/or services to that Prime Contractor (Tier I) for the benefit of FHLBank.

Woman-Owned Businesses are those in which: (1) more than fifty percent of the ownership or control is held, directly or indirectly, by one or more women; and (2) more than fifty percent of the net profit or loss accrues to one or more women.

Governance

Board of Directors

The board of directors (board), through the Compensation and People committee (CPC), is ultimately responsible for ensuring the overall effectiveness of FHLBank's MWI Program.

Executive Team

The Executive Team is responsible for implementing appropriate policies to ensure FHLBank complies with all applicable laws, regulatory requirements, practices and principles as well as approving this Policy.

People, Culture, and Development

The People, Culture, and Development (PCD) department has been designated by the board as the office and department responsible for carrying out the requirements of 12 U.S.C. §4520(a) and FHFA regulations, pursuant to 12 C.F.R. §1223.20(a), and accordingly shall provide advice to the board, senior management, and business partners on FHLBank's responsibilities pertaining to MWI. The PCD department is generally responsible for oversight of the MWI Program including but not limited to: (1) preparing, maintaining and reporting on the MWI Strategic Plan; (2) preparing, certifying, and submitting the MWI Annual Report and other reports as requested; (3) reviewing this Policy on an annual basis; (4) providing CPC and Strategic Operations Management committee (SOMC) with regular updates on the MWI Program; (5) developing internal procedures to support the MWI Program; (6) receiving and, in consultation with the Legal department, conducting reasonable investigations into complaints involving FHLBank's *Anti-Harassment and Equal Opportunity Policy Statement* and/or this Policy and analyzing any requests for a reasonable accommodation for disabilities and/or religious beliefs or practices; and (7) documenting all action taken regarding complaints and requests for reasonable accommodation.

Business Units

Business units are responsible for developing, implementing, and maintaining MWI activity procedures as appropriate.

Furthermore, the PCD, Enterprise Procurement, Capital Markets, and Housing & Community Development (HCD) departments, known as the Regulatory Reporting Stakeholders, have specific responsibilities regarding the MWI stakeholder areas of workforce, procurement, finance activities and housing and community development, respectively. The responsibilities include, but are not limited to, tracking and preparing data for regulatory reporting, and outreach.

MWI Business and Activities

In accordance with 12 C.F.R. 1223.21(b), MWI business and activities focus on seven categories – (1) Employment; (2) Contracting; (3) Other Business Activities; (4) Complaint Handling; (5) Requests for Reasonable Accommodation; (6) Monitoring/Reporting; and (7) Strategic Planning.

1. *Employment*
   The PCD department shall develop, implement, and maintain procedures to ensure, to the maximum extent possible in balance with financially safe and sound business practices, the inclusion and utilization of minorities, women, individuals with disabilities, and minority-, women-, and disabled-owned businesses in all business and activities. Employment practices include but are not limited to recruitment, hiring, promotion, succession planning, and retention practices. The PCD department shall engage in recruiting and outreach directed at encouraging individuals who are minorities, women, and/or individuals with disabilities to seek or apply for employment with FHLBank.

2. *Contracting*
   To adhere to the principles of equal opportunity and non-discrimination, , FHLBank shall endeavor to ensure, to the maximum extent possible, the inclusion of Minorities, women, Individuals with Disabilities and Minority-, Woman-, or Disabled-Owned Businesses in contracting opportunities. Contracting opportunities include financial activities and procurement.

   The Capital Markets department shall be responsible for developing, implementing, and maintaining procedures to ensure the requirements of this section are met regarding financial activities. The Enterprise Procurement department shall be responsible for developing, implementing, and maintaining procedures to ensure the requirements of this section are met regarding procurement activities, including any required contract provisions.

   After consideration of all relevant criteria and in support of a fair and competitive process based on merit and free from discrimination, the business unit should select the proposal that represents the best value to FHLBank, in accordance with FHLBank's obligations to balance financially safe and sound business practices and the requirements of 12 C.F.R. Part 1223.

3. *Other Business Activities*
   FHLBank shall encourage the consideration of diversity in nominating or soliciting nominees for positions on the board of directors.

4. *Complaint Handling*
   FHLBank shall conduct a prompt, thorough, and objective investigation of any assertion of a violation of the MWI regulations or this Policy, whether from an Applicant, a business partner, vendor, or a potential vendor. Any complaint shall be directed to the CPO. In the event of complaints involving PCD, complaints may be directed to the Chief Mission Officer/Chief Legal Officer, Corporate Secretary (CMO/CLO).

   The complaint form is located on FHLBank's website and may be requested via hard copy by calling 1-785-478-8028 or 1-785-478-8077. Completed forms may be submitted electronically to: CPO@FHLBTopeka.com; or hard copy to: FHLBank Topeka, Attn: CPO, 500 SW Wanamaker, Topeka, Kansas, 66606. In the case of complaints involving PCD, completed forms may be submitted electronically to: CMOCLO@FHLBTopeka.com; or hard copy at the foregoing address, Attn: CMO/CLO.

   After receiving a complaint form, the CPO or the CMO/CLO, as appropriate, in conjunction with the Legal department, shall conduct an investigation, as appropriate, and take whatever remedial or preventive

measures are necessary to ensure that both the letter and the spirit of this Policy are enforced. All MWI-related complaints shall be tracked for purposes of including in the MWI Annual Report.

5. *Requests for Reasonable Accommodation*
   In accordance with PCD procedures, any request for a reasonable accommodation for disabilities and/or religious beliefs or practices shall be directed to the CPO. After receiving any such request, the CPO shall follow such procedures as the CPO has developed, with consultation and approval of an attorney in the Legal department as the CPO has deemed necessary and appropriate, for accepting, reviewing, and granting or denying requests for reasonable accommodations of disabilities and/or religious beliefs or practices and shall document, on the request, the reasons for granting or denying the request for reasonable accommodation form. All requests shall be tracked for purposes of including in the MWI Annual Report.

6. *Monitoring and Reporting*
   The PCD department, in partnership with the regulatory stakeholders (PCD, Capital Markets, Enterprise Procurement, HCD and Legal), shall utilize the MWI Regulatory Reporting Data Management Architecture to inform and direct the regulatory reporting process. Regulatory stakeholders shall implement appropriate internal procedures to track the information necessary to prepare the reports required by the FHFA. Such information shall be compiled in compliance with the guidance provided by the FHFA.

   To aid in the oversight of FHLBank's MWI Program, the CPO shall prepare and submit periodic reports on the MWI program to the CPC and SOMC.

7. *Strategic Planning*
   The Office of MWI shall prepare an MWI Strategic Plan every three years to be approved by the board, which shall be reviewed annually. The MWI Strategic Plan may be a stand-alone plan or be incorporated in the bank-wide plan and shall meet the requirements of FHFA regulations pertaining to MWI at 12 C.F.R. Part 1223.21.

No Retaliation Permitted

Retaliation or reprisal against anyone for reporting complaints pursuant to this Policy, for cooperating with an investigation of a complaint, or for making a request for a reasonable accommodation for disabilities and/or religious beliefs or practices is expressly and strictly prohibited. Reports of possible retaliatory behavior shall be made to the CPO or the Legal department, as appropriate, and will be appropriately investigated in a prompt, adequate, and unbiased manner.

Limitation of Expressed Rights or Benefits

This Policy does not, and should not be construed to create, any right or benefit, substantive or procedural, enforceable at law, in equity, or through administrative proceeding, by any party against FHLBank or its directors, business partners, agents or any other person.

Exceptions/Violation

Exceptions to this Policy are permitted only by the President or the CPO, unless otherwise contemplated in this Policy. Exceptions to this Policy, other than those reflected in ProcessUnity, shall be reported to the CPC in the next regular report of PCD regarding MWI.

Any violation of this Policy may result in disciplinary action up to and including termination.

Policy Publication

This Policy shall be posted on FHLBank's website, in a format that is readable by reading software for the visually impaired.

Policy Review

This Policy shall be reviewed annually and revised as needed by the CPO. Following such review, the Policy shall be submitted for review by the Executive Team and approval by the President. In the event of any proposed revisions to the Policy, such revisions shall be submitted for review and approval by the CPC and the board.