Farm Credit System Insurance Corporation

Audited Financial Statements
For the Years Ended December 31, 2020 and 2019

Farm Credit System Insurance Corporation

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Independent Auditor's Report

Board of Directors
Farm Credit System Insurance Corporation
McLean, Virginia

Opinions on the Financial Statements and Internal Control Over Financial Reporting

We have audited the financial statements of the Farm Credit System Insurance Corporation (FCSIC), which comprise the statements of financial position as of December 31, 2020 and 2019, and the related statements of income and expenses and changes in Insurance Fund and cash flows for the years then ended, and the related notes to the financial statements. In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Farm Credit System Insurance Corporation as of December 31, 2020 and 2019, and the results of its operations and its cash flows of the years then ended in accordance with accounting principles generally accepted in the United States of America.

We have also audited FCSIC's internal control over financial reporting as of December 31, 2020, based on criteria established in *Internal Control – Integrated Framework (2013)* issued by the Committee of Sponsoring Organizations of the Treadway Commission (the "COSO criteria"). In our opinion, the Farm Credit System Insurance Corporation maintained, in all material respects, effective internal control over financial reporting as of December 31, 2020, based on the COSO criteria.

Basis for Opinions

We conducted our audits in accordance with auditing standards generally accepted in the United States of America (GAAS) and the standards applicable to financial audits contained in *Government Auditing Standards* issued by Comptroller General of the United States. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audits of the Financial Statements and Auditor's Responsibilities for the Audit of Internal Control Over Financial Reporting sections of our report. We are required to be independent of the Farm Credit System Insurance Corporation and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audits. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

Responsibilities of Management for the Financial Statements and Internal Control Over Financial Reporting

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error. Management is also responsible for designing, implementing, and maintaining effective internal control over financial reporting and for its assessment about the effectiveness of internal control over financial reporting, included in the accompanying *Management's Report on Internal Control Over Financial Reporting*.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the FCISC's ability to continue as a going concern within one year after the date that the financial statements are issued.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error and to issue an auditor's report that includes our opinion.

Reasonable assurance is a high level of assurance, but is not absolute assurance, and therefore is not a guarantee that an audit conducted in accordance with GAAS and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with GAAS and *Government Auditing Standards* we:

- Exercise professional judgment and maintain professional skepticism throughout the audits.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the financial statement audit in order to design audit procedures that are appropriate in the circumstances.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the FCSIC's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the financial statement audit.

Auditor's Responsibilities for Audit of Internal Control Over Financial Reporting

Our objectives are to obtain reasonable assurance about whether effective internal control over financial reporting was maintained in all material respects and to issue an auditor's report that includes our opinion on internal control over financial reporting. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit of internal control over financial reporting conducted in accordance with GAAS will always detect a material weakness when it exists.

In performing an audit of internal control over financial reporting in accordance with GAAS, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Obtain an understanding of internal control over financial reporting relevant to the audit of internal control over financial reporting, assess the risks that a material weakness exists, and test and evaluate the design and operating effectiveness of internal control over financial reporting based on the assessed risk.

Definition and Limitations of Internal Control over Financial Reporting

An entity's internal control over financial reporting is a process effected by those charged with governance, management, and other personnel, designed to provide reasonable assurance regarding the preparation of reliable financial statements in accordance with accounting principles generally accepted in the United States of America. An entity's internal control over financial reporting includes those policies and procedures that (1) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the entity; (2) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with accounting principles generally accepted in the United States of America, and that receipts and expenditures of the entity are being made only in accordance with authorizations of management and those charged with governance; and (3) provide reasonable assurance regarding prevention, or timely detection and correction of unauthorized acquisition, use, or disposition of the entity's assets that could have a material effect on the financial statements.

Because of its inherent limitations, internal control over financial reporting may not prevent, or detect and correct, misstatements. Also, projections of any assessment of effectiveness to future periods are subject to the risk that controls may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

Compliance and Other Matters Based on an Audit of Financial Statements

As part of obtaining reasonable assurance about whether the Farm Credit System Insurance Corporation's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

BDO USA, LLP

Potomac, Maryland
February 17, 2021

Farm Credit System Insurance Corporation

Statements of Financial Condition

(Dollars in thousands)

December 31,		**2020**		2019
Assets				
Cash and cash equivalents	**$**	**664,600**	$	103,408
Investments in U.S. Treasury obligations		**4,512,618**		4,853,235
Premiums receivable		**255,365**		222,676
Accrued interest receivable		**22,295**		22,178
General property, plant, equipment, and software, net		**25**		44
Total assets	**$**	**5,454,903**	$	5,201,541
Liabilities and Insurance Fund				
Liabilities				
Accounts payable and accrued expenses	**$**	**649**	$	530
Total liabilities		**649**		530
Insurance Fund				
Allocated Insurance Reserves Accounts (AIRAs)		**-**		62,714
Unallocated Insurance Fund		**5,454,254**		5,138,297
Total Insurance Fund		**5,454,254**		5,201,011
Total liabilities and Insurance Fund	**$**	**5,454,903**	$	5,201,541

See accompanying notes to the financial statements.

Farm Credit System Insurance Corporation

Statements of Income and Expenses and Changes in Insurance Fund

(Dollars in thousands)

Year-ended December 31,	**2020**	2019
Income		
Premiums	**$ 255,365**	$ 222,676
Interest income	**64,650**	94,435
Total income	**320,015**	317,111
Expenses		
Administrative operating expenses	**4,058**	3,899
Total expenses	**4,058**	3,899
Net income	**315,957**	313,212
Insurance Fund - beginning of year	**5,201,011**	4,953,860
Payments to AIRAs accountholders	**(62,714)**	(66,061)
Insurance Fund - end of year	**$ 5,454,254**	$ 5,201,011

See accompanying notes to the financial statements.

Farm Credit System Insurance Corporation

Statements of Cash Flows

(Dollars in thousands)

Year-ended December 31,	**2020**	2019
Cash flows from operating activities		
Net income	**$ 315,957**	$ 313,212
Adjustments to reconcile net income to net cash provided by operating activities:		
Depreciation	**19**	16
Net amortization and accretion of investments	**11,012**	(7,682)
Increase in premiums receivable	**(32,689)**	(10,152)
Increase in accrued interest receivable	**(117)**	(4,919)
Increase in accounts payable and accrued expenses	**119**	163
Net cash provided by operating activities	**294,301**	290,638
Cash flows from investing activities		
Payments for purchase of U.S. Treasury obligations	**(1,866,956)**	(3,206,617)
Proceeds from maturity of U.S. Treasury obligations	**2,196,561**	2,797,681
Net cash provided by (used in) investing activities	**329,605**	(408,936)
Cash flows from financing activity		
Payment to AIRAs accountholders	**(62,714)**	(66,061)
Net cash used in financing activity	**(62,714)**	(66,061)
Net change in cash and cash equivalents	**561,192**	(184,359)
Cash and cash equivalents, beginning of year	**103,408**	287,767
Cash and cash equivalents, end of year	**$ 664,600**	$ 103,408

See accompanying notes to the financial statements.

Note 1: Organization and Summary of Significant Accounting Policies

Farm Credit Insurance Fund (Insurance Fund): Statutory Framework

The Agricultural Credit Act of 1987 established the Farm Credit System Insurance Corporation (the Corporation or FCSIC) for the purpose of ensuring the timely payment of principal and interest on notes, bonds, debentures, and other obligations issued under subsection (c) or (d) of section 4.2 of the Farm Credit Act of 1971, as amended (the Farm Credit Act). Each bank in the Farm Credit System (System) participating in insured obligations is an insured System bank. At December 31, 2020 and 2019, there were four insured System banks and 68 direct lender associations.

The Corporation is managed by a board of directors consisting of the same individuals as the Farm Credit Administration (FCA) board except that the chairman of the FCA board may not serve as the chairman of the Corporation's board of directors.

The Corporation must spend amounts in the Insurance Fund necessary to insure the timely payment of interest and principal on insured obligations. The Corporation, in its sole discretion, is authorized to expend amounts to provide financial assistance to System banks and direct lender associations. The Corporation may also act as receiver or conservator of a System bank or association. The 2018 Farm Bill also provided authority for FCSIC to create, and the Farm Credit Administration to charter, a System bridge bank, to assist with resolving a failed bank.

As of December 31, 2020, the System banks reported amounts totaling $323 billion of insured obligations compared to $294 billion as of December 31, 2019.

If the Corporation does not have sufficient funds to ensure payment on insured obligations, System banks will be required to make payments under joint and several liability, as required by section 4.4 (a)(2) of the Farm Credit Act. The insurance provided by the Insurance Fund is limited to the resources in the Insurance Fund. System obligations are not guaranteed by the U.S. government.

Under section 5.63 of the Farm Credit Act, the Corporation is exempt from all Federal, state, and local taxes with the exception of real property taxes.

Note 2: Basis of Accounting

The accounting and reporting policies of the Corporation conform to accounting principles generally accepted in the United States of America (GAAP) and, as such, the financial statements have been prepared using the accrual basis of accounting.

Cash and Cash Equivalents

Cash and cash equivalents include investments in U.S. Treasury obligations with original maturities of 90 days or less. At December 31, 2020, the Corporation held $664.3 million in overnight Treasury certificates maturing on January 4, 2021, with an interest rate of 0.06 percent, and $309.7 thousand in cash. At December 31, 2019, the Corporation held $103.2 million in overnight Treasury certificates maturing on January 2, 2020, with an interest rate of 1.51 percent, and $200 thousand in cash.

Investments in U.S. Treasury Obligations

Section 5.62 of the Farm Credit Act requires that funds of the Corporation, not otherwise employed, shall be invested in obligations of the United States or in obligations guaranteed as to principal and interest by the United States. The Corporation has classified its investments as held-to-maturity in accordance with Financial Accounting Standards Board Accounting Standards Codification 320, *Investments - Debt and Equity Securities* and carries them at amortized cost. Amortization of premium and accretion of discount on investments has been computed under the interest method since 2002. Fair value of investments is estimated based on quoted market prices for those or similar instruments.

Premium Receivable – Concentration of Credit Risk

The Farm Credit Act requires that the System banks pay premiums to FCSIC. The premium receivable balance consists of amounts due from the four System banks and as such is exposed to risks due to concentration. Historically, FCSIC has not experienced any losses related to the premium receivable balance. FCSIC performs a quarterly analysis related to estimating an allowance for premium receivable which continues to indicate that no allowance is warranted.

Liability for Estimated Insurance Obligations

The liability for estimated insurance obligations is the present value of estimated probable insurance payments to be made in the future based on the Corporation's analysis of economic conditions of insured System banks.

The insured System banks' primary lending markets are borrowers engaged in farming, ranching, and producing or harvesting of aquatic products, and their cooperatives. Financial weaknesses in these market segments and the effect of general market conditions on the System's borrowers could adversely affect the banks' financial condition and profitability. Insured System banks also face risks from changing interest rate environments and the need to maintain ongoing access to financial markets. Adverse changes in the financial condition and profitability of insured System banks resulting from increased levels of credit, financial, or other risks could occur in the future which would require a liability for estimated insurance obligations to be recorded.

The Corporation actively monitors the creditworthiness and financial condition of the insured System banks. Management is not aware of any events or circumstances at this time which would require a liability for estimated insurance obligations to be recorded at December 31, 2020.

Premiums

Annual premiums are recorded as revenue during the 12-month calendar year period on which the premiums are based. All premiums are required to be paid to FCSIC on or before January 31st of the year subsequent to the year in which they are earned.

Use of Estimates

The preparation of financial statements, in conformity with GAAP, requires management to make estimates and assumptions that affect the reported amount of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amount of revenues and expenses during the reporting period. Actual results could differ from those estimates.

Note 3: Investments in U.S. Treasury Obligations

In addition to the amounts referenced in Note 2, Cash and Cash Equivalents, at December 31, 2020 and 2019, investments in U.S. Treasury obligations, which are carried at amortized cost, consisted of the following:

(Dollars in thousands)	Amortized Cost	Gross Unrealized Gains	Gross Unrealized Losses	Estimated Fair Value
December 31, 2020				
U.S. Treasury obligations	$ 4,512,618	$ 75,569	$ (183)	$ 4,588,004
December 31, 2019				
U.S. Treasury obligations	$ 4,853,235	$ 15,375	$ (2,880)	$ 4,865,730

The amortized cost and estimated fair value of U.S. Treasury obligations at December 31, 2020, by contractual maturity, are shown below:

(Dollars in thousands)	Amortized Cost	Estimated Fair Value
Due in one year or less	$ 2,748,618	$ 2,756,606
Due after one year through five years	1,764,000	1,831,398
	$ 4,512,618	$ 4,588,004

The Corporation follows GAAP for measuring, reporting, and disclosing fair value. These standards apply to all assets and liabilities that are measured, reported, and/or disclosed on a fair value basis. The fair value of FCSIC's investments in U.S. Treasury obligations are estimated based on quoted market prices for those instruments.

Note 4: Premiums, the Secure Base Amount and Excess Insurance Fund Balances

Each System bank which issues insured obligations under subsection (c) or (d) of section 4.2 of the Farm Credit Act is an insured System bank and is required to pay premiums to the Corporation.

The Farm Credit Act requires FCSIC to assess premiums based on each bank's pro rata share of insured debt (rather than on individual loans). FCSIC may collect from 0 to 20 basis points annually on adjusted insured debt outstanding. The Farm Credit Act also authorizes a risk surcharge of up to 10 basis points on nonaccrual loans and on other-than-temporarily impaired investments. The Farm Credit Act reduces the total insured debt on which premiums are assessed by 90 percent of Federal government-guaranteed loans and investments and 80 percent of state government-guaranteed loans and investments and deducts similar percentages of such guaranteed loans and investments when calculating the secure base amount (SBA).

The Farm Credit Act sets a secure base amount (SBA) for the Insurance Fund to achieve. The statutory SBA is equivalent to 2 percent of the aggregate outstanding insured obligations of all insured System banks (adjusted downward by a percentage of the guaranteed portions of principal outstanding on certain government-guaranteed loans and investments) or such other percentage as determined by the Corporation in its sole discretion to be actuarially sound to maintain in the Insurance Fund taking into account the risk of insuring outstanding insured obligations.

Insurance premium rates are reviewed semiannually. For 2020, the board of directors set premium rates at its January 30, 2020 meeting at 8 basis points on average adjusted insured debt and continued the assessment of the 10 basis point surcharge on the average principal balance outstanding for nonaccrual loans and other-than-temporarily impaired investments. The board of directors again reviewed premiums at its June 25, 2020 meeting and voted to increase the premium accrual rate on average adjusted insured debt to 11 basis points and continued the assessment of the 10 basis point surcharge on the average principal balance outstanding for nonaccrual loans and other-than-temporarily impaired investments for the remainder of 2020. In 2020, outstanding insured obligations increased by $28.6 billion (9.7 percent). At December 31, 2020, the total Insurance Fund was 1.93 percent of adjusted insured obligations.

For 2019, the board of directors set premium rates at its January 17, 2019 meeting at 9 basis points on average adjusted insured debt and continued the assessment of the 10 basis point surcharge on the average principal balance outstanding for nonaccrual loans and other-than-temporarily impaired investments. The board of directors again reviewed premiums at its June 13, 2019 meeting and voted to maintain the premium accrual rate on average adjusted insured debt at 9 basis points and continued the assessment of the 10 basis point surcharge on the average principal balance outstanding for nonaccrual loans and other-than-temporarily impaired investments for the remainder of 2019. In 2019, outstanding insured obligations increased by $11.8 billion (4.2 percent). At December 31, 2019, the total Insurance Fund was 2.03 percent of adjusted insured obligations.

The Farm Credit Act requires if, at the end of any calendar year, the aggregate of the amounts in the Insurance Fund exceed the SBA, the Corporation is required to allocate to the Allocated Insurance Reserves Accounts (AIRAs) any excess balances less the amount that the Corporation, in its sole discretion, determines to be the sum of the estimated operating expenses and estimated insurance obligations of the Corporation for the immediately succeeding calendar year.

The total Insurance Fund did not exceed the 2 percent SBA at December 31, 2020, and there were no allocations to the Farm Credit System banks for AIRAs. As the total Insurance Fund exceeded the 2 percent SBA at December 31, 2019, there was an allocation of $62.7 million to the Farm Credit System banks AIRAs.

The AIRAs' balances are recorded as part of the Insurance Fund until approved for payment by the Corporation's board of directors. AIRAs' balances may be used to absorb any insurance losses and claims. Furthermore, the board of directors has discretion to limit or restrict the AIRAs' payments.

Note 5: Operating Lease

The Corporation is committed under a ten-year lease with the FCS Building Association for office space expiring on November 30, 2025. The Corporation recorded lease expense (including operating cost assessments) of $150 thousand and $147 thousand for 2020 and 2019, respectively. The following is a schedule by year of the future minimum lease payments required under this lease as of December 31, 2020:

Years ending December 31, *(Dollars in thousands)*		
2021	$	151
2022		155
2023		158
2024		161
2025		150
	$	775

Note 6: Line of Credit

On September 24, 2013, the Corporation entered into an agreement with the Federal Financing Bank (the FFB), a United States government corporation subject to the supervision and direction of the U.S. Treasury. Pursuant to this agreement, the FFB may advance funds to the Corporation when exigent market circumstances make it extremely doubtful that insured System banks will be able to pay maturing debt obligations. The Corporation will in turn use the funds advanced by the FFB to provide assistance to the System banks until market conditions improve. The agreement provides for a short-term revolving credit facility of up to $10 billion, renewable annually and terminating on September 30, 2021, unless otherwise further extended.

Under the agreement, each provision of funds by the FFB is subject to certain terms and conditions. The interest rate for each advance will be established by the FFB at the time the respective advance is made. Each advance cannot have a maturity date longer than twelve months and the maturity date cannot be later than the final termination date of the agreement.

The Corporation paid no commitment fee to secure this line of credit. There were no amounts drawn on this line of credit during 2020 and 2019.

Note 7: Retirement Plan

All permanent Corporation employees are covered by the Federal Employees Retirement System (FERS). The Corporation's contribution was 16.0 percent of base pay for the first nine months of 2020 and 17.3 percent for the last three months of 2020. The Corporation’s contribution to the FERS plan during 2019 was 13.7 percent of base pay for the first nine months of 2019 and 16.0 percent for the last three months of 2019. In addition, the Corporation automatically contributes 1 percent of base pay to the employee's Thrift Savings Plan account, matches the first 3 percent contributed by the employee, and matches one-half of the next 2 percent contributed by the employee. In 2015, the Corporation began a 401K plan for employees. The Corporation automatically contributes 1 percent of base pay to the employee's 401K account and matches the first 2 percent contributed by the employee. Retirement plan expenses amounted to $489 thousand in 2020 and $434 thousand in 2019.

Note 8: Related Parties

The Corporation purchases services from FCA under an Interagency Agreement, including examination and administrative support services. The intention of the parties as stated in the agreement is that specified rates and fees will reimburse the party providing services for all reasonable costs associated with provision of the services. The Corporation purchased services for 2020 which totaled $379 thousand, compared with $366 thousand for 2019.

The Corporation may also provide services to the FCA under an Interagency Agreement; however, the Corporation provided no services and recognized no revenue for 2020 and 2019. At December 31, 2020 and 2019, the Corporation did not have any receivables from the FCA.

Note 9: Risk and Uncertainties Related to COVID-19

In early 2020, an outbreak of the novel strain of coronavirus (COVID-19) emerged globally. As a result, there have been mandates from federal, state and local authorities resulting in an overall decline in economic activity. The effect of the COVID-19 pandemic on the overall financial performance of the System has been limited. The financial performance of the System was strong during 2020 and the overall credit quality of its customers remained relatively consistent with the prior year. Consequently, the impact of the COVID-19 pandemic on the Insurance Fund has also been limited and the likelihood of a loss to the Insurance Fund related to the COVID-19 pandemic appears remote in the near-term.

For 2021, the extent to which the COVID-19 pandemic impacts the System, including the insured System banks, depends on future developments that remain highly uncertain and cannot be predicted. Any impact on the System could impact the Insurance Fund. Management will continue to actively monitor the financial condition of the System.

Note 10: Subsequent Events

FCSIC evaluated subsequent events from the date of the statement of financial condition through February 17, 2021, the date at which FCSIC’s financial statements were issued. No material subsequent events were identified for either recognition or disclosure.

Farm Credit System Insurance Corporation

Management's Report on Internal Control Over Financial Reporting

The Farm Credit System Insurance Corporation's (FCSIC) internal control over financial reporting is a process effected by those charged with governance, management, and other personnel, designed to provide reasonable assurance regarding the preparation of reliable financial statements in accordance with generally accepted accounting principles in the United States of America. Our internal control over financial reporting includes those policies and procedures that (1) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect our transactions and dispositions of our assets; (2) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles and that receipts and expenditures of FCSIC are being made only in accordance with authorizations of FCSIC management and those charged with governance; and (3) provide reasonable assurance regarding prevention, or timely detection and correction, of unauthorized acquisition, use, or disposition of FCSIC's assets that could have a material effect on our financial statements.

Management of FCSIC is responsible for designing, implementing, and maintaining effective internal control over financial reporting. Management assessed the effectiveness of FCSIC's internal control over financial reporting as of December 31, 2020 using the criteria established in the *Internal Control - Integrated Framework (2013),* issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO). Based on that assessment, management concluded that as of December 31, 2020, FCSIC's internal control over financial reporting is effective, based on the COSO criteria.

Internal control over financial reporting has inherent limitations. Internal control over financial reporting is a process that involves human diligence and compliance and is subject to lapses in judgement and breakdowns resulting from human failures. Internal control over financial reporting also can be circumvented by collusion or improper management override. Because of its inherent limitations, internal control over financial reporting may not prevent, or detect and correct, misstatements. Also, projections of any assessment of effectiveness to future periods are subject to the risk that controls may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

PFITZINGERR Digitally signed by PFITZINGERR Date: 2021.02.17 20:01:11 -05'00'

C. Richard Pfitzinger
Chief Operating Officer

ANDREW GRIMALDI Digitally signed by ANDREW GRIMALDI Date: 2021.02.17 19:00:28 -05'00'

Andrew J. Grimaldi
Chief Financial Officer

LYNN POWALSKI Digitally signed by LYNN POWALSKI Date: 2021.02.17 19:51:40 -05'00'

Lynn M. Powalski
General Counsel

HOWARD RUBIN Digitally signed by HOWARD RUBIN Date: 2021.02.17 19:12:03 -05'00'

Howard I. Rubin
Chief Risk Officer

February 17, 2021