



Whistleblower Policy

March 23, 2018

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1.0 INTRODUCTION

The Federal Home Loan Bank of Indianapolis (the "Bank") is committed to complying with, and requiring employees to comply with, all applicable laws, regulations, accounting standards, internal accounting controls, audit practices, the Code of Conduct, and all other policies and procedures established by the Bank. The Bank has adopted this Policy in order to:

- Encourage disclosure and investigation of improprieties before they can disrupt the business or operations of the Bank or lead to serious loss;
- Promote a climate of accountability with respect to Bank resources; and
- Ensure that no employee should feel at a disadvantage in lawfully raising legitimate concerns.

Individuals are encouraged to report concerns regarding any questionable actions, activities or other matters outlined in this Policy. **Any person may submit a good faith complaint, report or concern regarding such matters without fear of dismissal or retaliation of any kind.**

The Bank, acting through the Disclosure Committee, is authorized to adopt, amend and maintain procedures (Procedures) to implement this Policy. The Procedures may exclude other matters from the scope of this Policy.

In case of a conflict among the requirements of this Policy, the Procedures, applicable law, or regulation (including, without limitation, applicable guidance, Advisory Bulletin, Q&A, or other written advice of the Federal Housing Finance Agency ("Finance Agency"), the following will govern in order of priority: (1) applicable law, (2) applicable regulation (as defined above), (3) this Policy, and (4) Procedures.

1.1. SCOPE AND RELATED DOCUMENTS

To the extent not specifically addressed in a particular policy of the Bank and subject to all applicable laws and regulations that may apply, this Policy relates to and governs the handling of complaints, reports, and concerns about possible violations of the following:

- The Bank's *Anti-Fraud Policy*, *Disclosure Policy*, and *Policy Prohibiting Insider Trading of Securities*
- Applicable laws, rules and regulations
- The Bank's *Code of Conduct* and *Employee Handbook*
- Any other code, policy, or procedure established by the Bank

1.2. ROLES/RESPONSIBILITIES

Department/Officer/Working Group/Committee/Other	Brief Summary of Responsibilities
Legal/Compliance	Responsible for updating this Policy to reflect changes in law or regulation related to the protection of whistleblowers in the workplace.

1.3. EXCEPTIONS

No exceptions to this Policy are allowed.

1.4. VIOLATIONS

Willful or grossly negligent non-compliance with this Policy may subject a person to discipline per the *Code of Conduct*.



2.0 POLICY

All employees, officers, and directors shall operate within the framework of this Policy, and other related Bank policies and procedures.

2.1. REPORTING PROCESS

The Bank has retained a third-party provider, EthicsPoint, to accept, verify, and log any complaints received. Any individual with concerns regarding possible violations can anonymously report a complaint through EthicsPoint by telephone or the Internet at:

Telephone Number: 1-866-850-1408

Internet Address: https://secure.ethicspoint.com/domain/en/report_company.asp?clientid=2453

Alternatively, any person wishing to communicate directly with an individual at the Bank to register a complaint may contact the Bank's Chief Internal Audit Officer (CIAO), the General Counsel – Chief Compliance Officer (CCO) or the Director of Human Resources. Further, reports may be provided to senior officers or Directors but should not be discussed with or reported to non-supervisory level employees at any time. If a complaint involves any of the above-referenced persons or any member of the Audit Committee of the Board of Directors (the "Board"), the complaint can be reported to any of the non-involved persons, notwithstanding the subject matter of the complaint. Contact information for any of the identified officers can be found on the Bank's Intranet or public Web site.

The reporting individual should provide names, dates, places, and other details sufficient to facilitate an effective investigation.

2.2. CONFIDENTIALITY

The Bank encourages individuals to identify themselves when making a report to aid in the investigation. However, any person who does not want to be identified is entitled to register a report anonymously.

The Bank will treat all reports in a confidential manner. If a person has identified himself or herself when making a complaint in good faith, the Bank will exercise particular care to keep the person's identity confidential until a formal investigation is launched. Thereafter, the identity of the person who registered the complaint will be kept confidential unless disclosure is necessary to complete a fair investigation or for another overriding reason, or as required by law or regulation.

2.3. NOTICE OF COMPLAINTS AND INVESTIGATIONS

Upon receiving a report under this policy, EthicsPoint will notify the Chief Internal Audit Officer (CIAO), General Counsel – Chief Compliance Officer (CCO), and the Director of Human Resources. In the event a report is received directly by one of these officers, the recipient shall notify the other officers and the CIAO will provide notice to the Chairman and Vice Chairman of the Audit Committee. The Chairman and the Vice Chairman of the Audit Committee will be made aware that a complaint has been received with respect to alleged violations of the *Anti-Fraud Policy*, *Disclosure Policy*, *Policy on Insider Trading of Securities* or any accounting or financial controls standard or requirement. Such complaints shall be handled by the CIAO, at the direction of the Chairman of the Audit Committee, or the Vice Chairman if the Chairman is precluded from acting under this Policy. The General Counsel – CCO and the Director of Human Resources will generally handle all reports involving all non-accounting, non-auditing, or non-financial issues, unless otherwise directed by the Board, the Audit Committee or the President – Chief Executive Officer (CEO).

Further, the President – CEO and Executive Vice President – Chief Financial Officer (CFO) shall be apprised of the existence of any investigation unless their potential involvement has been raised in any allegation or report leading to the investigation. They shall also be kept apprised of the status of the investigation at least quarterly and prior



to the end of any reporting period for which the CEO and CFO must provide written certifications and representations to outside auditors, the Finance Agency, or the Securities and Exchange Commission (SEC).

No person who is the subject of any report will receive such notification.

2.4. HANDLING OF COMPLAINTS

Upon receiving notice of a complaint, either directly or through EthicsPoint, and subject to any specific requirements of an applicable Bank policy or related law or regulation, the Chief Internal Audit Officer (CIAO), the General Counsel – Chief Compliance Officer (CCO), or the Director of Human Resources, will undertake a preliminary investigation to determine if the information can be substantiated. The CIAO shall report to the Chairman and Vice Chairman of the Audit Committee, and the General Counsel – CCO or Director of Human Resources shall report to the President – CEO and, as necessary, the applicable committee of the Board of Directors. Those persons shall determine if any further action is required to fully evaluate the report.

The Chairman of the Audit Committee, the President – CEO, or the Board may determine that the CIAO or the General Counsel – CCO may initiate an internal investigation or require that an independent investigation by outside counsel or other external consultants be undertaken. The CIAO and the General Counsel – CCO may involve others from Human Resources, Legal, Compliance or other management as deemed appropriate. The CIAO and/or the General Counsel – CCO may agree to authorize an independent investigation or to engage consultants to assist in the investigation, even if not required by the President – CEO or the Chairman of the Audit Committee.

Prompt and appropriate corrective action will be taken when warranted in the judgment of the Audit Committee, the President – CEO, or the Board, (or its applicable Board committee) as appropriate.

2.5. COMPLAINT RECORDKEEPING AND PERIODIC REPORTING

The CIAO, General Counsel – CCO, and Director of Human Resources shall maintain an appropriate record of all reports received by their applicable departments, whether through EthicsPoint or otherwise, and shall track such reports through their investigation and ultimate resolution. A periodic summary of such reports shall be made to the Audit Committee or other appropriate committee of the Board. The Internal Audit Department shall perform annual testing of the EthicsPoint reporting service.

2.6. NO RETALIATION

Retaliation, intimidation, or discriminatory conduct by any employee, Director, or Advisory Council member against any individual who makes a report, raises a concern, provides information, or otherwise assists in an investigation related to a possible *Code of Conduct* violation, potential fraud, and/or suspected employee wrongdoing reported by this individual in good faith is strictly prohibited and will not be tolerated. In certain cases, such retaliation may in and of itself be a violation of law. Any individual who believes that any retaliatory, intimidating, or discriminatory conduct has occurred or is likely to occur should report the matter to the General Counsel or Deputy General Counsel. Reports can also be made to the Director of Human Resources, the Chief Internal Audit Officer, or the Chair of the Audit Committee. In certain cases, the Bank may retain a third party audit or legal firm to assist in internal and/or external investigations. The *Whistleblower Policy*, as well as this “No Retaliation” section of the *Code of Conduct* apply in the same manner when it comes to reports or information provided by individuals in good faith to the contracted third party.

If the complaint of retaliation is substantiated, the Bank will take appropriate action against the perpetrator of the retaliatory conduct, up to and including termination of employment and reporting to the appropriate authorities.



3.0 AMENDMENTS

The Board may amend this Policy at any time.

4.0 APPROVAL AND REVIEW CYCLE

This Policy, as amended, is effective as of March 23, 2018. The Audit Committee will review this Policy, recommend any changes, and recommend Board approval at least once per calendar year.

5.0 RELEVANT AUTHORITIES AND REFERENCES

Applicable Securities and Exchange Commission rules and regulations

6.0 DOCUMENT CHANGE RECORD

Version	Date	Description	Reviewed by
1.0	03/18/2016	Policy transferred to Bank Policy Framework; no content changes for annual re-adoption of this Policy.	General Counsel - CCO
1.1	03/24/2017	Minor document clean-up prior to annual re-adoption by the Board. No authoritative policy changes to content.	Policy Management Legal/Compliance Audit Committee - Board
2.0	03/23/2018	Annual maintenance. "No Retaliation" Section 2.6 has been expanded. Some minor re-formatting to comply with the Bank's Policy Framework and rebranding guidelines.	Policy Management Legal/Compliance Audit Committee - Board