



# Whistleblower Policy

March 24, 2023

## Policy Information

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## 1 INTRODUCTION

The Federal Home Loan Bank of Indianapolis (the “**Bank**”) is committed to complying with, and requiring employees<sup>1</sup> and other covered persons to comply with, all applicable laws, applicable regulations, accounting standards, internal accounting controls, auditing practices, the Bank’s Code of Ethics for Senior Financial Officers (the “**Code of Ethics**”) and the Code of Conduct and Conflict of Interest Policy applicable to a Covered Person (as defined below) and all other policies and procedures established by the Bank.

The Bank has adopted this Policy in order to:

- Provide for the receipt, retention, and treatment of complaints received by the Bank regarding accounting, internal accounting controls, or auditing matters, and for the confidential, anonymous submission by Covered Persons (as defined below) of concerns regarding questionable accounting or auditing matters;<sup>1</sup>
- Provide for the receipt, retention and treatment of complaints received by the Bank regarding other concerns or alleged violations of law or Bank policy;
- Encourage disclosure and investigation of potential improprieties before they can disrupt the business or operations of the Bank or lead to serious loss;

<sup>1</sup> See 12 C.F.R. § 1239.32(e)(10); and 17 C.F.R. § 240.10A-3(b)(3).



- Promote a climate of accountability with respect to Bank resources; and
- Ensure that no Covered Person believes he or she is at any disadvantage in lawfully raising legitimate concerns.

Employees, directors, members of the Affordable Housing Advisory Council (“**Advisory Council Members**”), and contractors<sup>2</sup> (each a “**Covered Person**”) are subject to the Bank’s Code of Conduct and Conflict of Interest policy applicable to the Covered Person (individually referred to as the “**Applicable Code of Conduct**”) and all other applicable Bank policies including, but not limited to, the *Policy Prohibiting Insider Trading of Securities*, the *Anti-Fraud Policy*, the *Anti-Money Laundering Policy*, and the *Disclosure Policy*. Additionally, certain employees are subject to the Code of Ethics. Under the relevant Bank policy, a Covered Person may be required to report concerns regarding any questionable actions, activities or other matters outlined in this Policy as soon as possible so that any concerns can be properly investigated and addressed. Under this Policy, Covered Persons 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 additional procedures to implement this Policy, to the extent not assigned by applicable law and applicable regulations (including, without limitation, applicable guidance, Advisory Bulletins, Q&A, or other written advice, of the Federal Housing Finance Agency (“**Finance Agency**”) and the Securities and Exchange Commission (“**SEC**”)) (“**Applicable Regulations**”) to other responsible parties.

In case of a conflict among the requirements of charters of applicable committees of the Bank’s Board of Directors (“**Charters**”), this Policy, applicable law, or Applicable Regulations, the following will govern in order of priority: (1) applicable law, (2) Applicable Regulations, (3) any Charter, and (4) this Policy. This Policy is intended to reflect both Finance Agency and SEC requirements.

It is the Board’s intention that this Policy be administered so as to facilitate and achieve: (i) a complete and accurate determination of the relevant facts, (ii) the timely sharing of information among the Bank’s internal stakeholders having duties and responsibilities under all of the Bank’s policies, and (iii) the Bank’s compliance with all applicable laws, rules and regulations.

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<sup>1</sup> As such term is defined in the Code of Conduct and Conflict of Interest Policy for Employees and Contractors.

### 1.1. SCOPE

To the extent not specifically addressed in a particular policy of the Bank and subject to all applicable laws and Applicable Regulations that may apply, this Policy relates to and governs the handling of complaints, reports, and concerns about possible violations of any of the Bank’s policies and/or Applicable Codes of Conduct.

Moreover, nothing herein, or in any other Bank policy, shall be deemed to limit the authority of the Chief Internal Audit Officer (“**CIAO**”) or staff of the Internal Audit Department as set forth in the Internal Audit Department Charter.

### 1.2. RELATED DOCUMENTS

Anti-Fraud Policy

Anti-Money Laundering (AML) Policy

Code of Conduct and Conflict of Interest Policy for Directors

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<sup>2</sup> As such term is defined in the Code of Conduct and Conflict of Interest Policy for Employees and Contractors.



Code of Conduct and Conflict of Interest Policy for Employees and Contractors

Code of Conduct and Conflict of Interest Policy for Affordable Housing Advisory Council Members

Code of Ethics for Senior Financial Officers

Disclosure Policy

Employee Handbook

Policy Prohibiting Insider Trading of Securities

### 1.3. ROLES/RESPONSIBILITIES

Department/Officer/Working Group/Committee/Other	Brief Summary of Responsibilities
Board of Directors (“Board”)	Reviews and approves this Policy. Undertakes such other duties as may be laid out in the Policy.
Audit Committee of the Board	Reviews and approves revisions to this Policy and recommends approval of this Policy to the Board. Reviews and approves procedures established for (i) the handling of complaints received by the Bank questionable accounting, internal controls, or auditing matters and (ii) the confidential, anonymous submission by Bank staff of concerns regarding questionable accounting or auditing matters, which procedures are set forth herein. Receives notices of, and information regarding, certain complaints made under this Policy. Conducts or authorizes investigations. Undertakes such other duties as may be laid out in this Policy.
Disclosure Committee	Adopts, amends, and maintains additional procedures to implement this Policy to the extent such actions are not assigned by applicable law and applicable regulations (including, without limitation, applicable guidance, Advisory Bulletins, Q&A, or other written advice, of the Federal Housing Finance Agency and the SEC) to other responsible parties.
Legal	Responsible for review and recommendation of any updates to this Policy to reflect changes in law or Applicable Regulations related to the protection of Covered Person whistleblowers.

### 1.4. EXCEPTIONS

No exceptions to this Policy are allowed.

### 1.5. VIOLATIONS

Compliance with this Policy is a Covered Person’s responsibility under their Applicable Code of Conduct. Violations will be reported as set forth below.



## 2 POLICY

All Covered Persons shall conduct their activities in compliance with 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 Covered Person with concerns regarding any matter may report them 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](https://secure.ethicspoint.com/domain/en/report_company.asp?clientid=2453)

If a specific category of concern is not provided, select “other.”

Alternatively, any Covered Person wishing to communicate directly with an individual at the Bank to make a report of a violation or suspected violation of a Bank policy or Applicable Code of Conduct may do so by reporting the matter to the CIAO.

Subject to his or her right to remain anonymous, the reporting Covered Person is encouraged to provide in writing as much information as possible such as names, dates, places, and other details sufficient to facilitate a prompt and effective investigation.

### 2.2 CONFIDENTIALITY

The Bank encourages a Covered Person to identify himself or herself when making a report to aid in the investigation. However, any Covered 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 Covered Person has identified himself or herself when making a complaint, the Bank will exercise particular care to keep the Covered Person’s identity confidential until a formal investigation is launched under the Policy, another relevant Bank policy, the Code of Ethics, or the Applicable Code of Conduct. Thereafter, the identity of the Covered 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, the CIAO and/or EthicsPoint will notify the CIAO, the General Counsel, the AML Officer, and the Senior Vice President-Chief Human Resources and Diversity, Equity, & Inclusion Officer (“**CHR/DEI Officer**”) (together, the “**Notice Recipients**”). If the complaint received is regarding alleged violations of the *Code of Ethics*, *Anti-Fraud Policy*, *Disclosure Policy*, *Policy on Insider Trading of Securities*, *AML Policy* or any accounting or financial controls standard or requirement, the CIAO and/or EthicsPoint will also notify the Chair and Vice Chair of the Audit Committee.

Following each notification, the Notice Recipients shall immediately convene and coordinate the investigation and further reporting of the matter. Investigations and reporting shall be undertaken as determined by the Notice Recipients, subject to the CIAO’s right to reserve any such investigations and reporting to himself or his designees as he so determines in his unlimited discretion as set forth in the Internal Audit Department Charter.

No individual who is the subject of any report will receive notifications or investigation updates under this Policy.



## 2.4 HANDLING OF COMPLAINTS

Upon receiving notice of a complaint, either directly or through EthicsPoint,<sup>3</sup> a preliminary investigation will be undertaken to determine if the information can be substantiated. The CIAO shall promptly report on the results of the investigation to the Chairman and Vice Chairman of the Audit Committee, and to the President-CEO, AML Officer, General Counsel, and the CHR/DEI Officer.

The CIAO, the Chair and Vice Chair of the Audit Committee shall determine if any further action is required to fully evaluate the report. Additionally, if the CIAO, Audit Committee Chair and Audit Committee Vice Chair determine no further action is required, any of the President-CEO, CHR/DEI Officer, or General Counsel may require further actions to be undertaken to fully evaluate the report.

The Chair of the Audit Committee, the Board, the President – CEO, or the CIAO may initiate an internal investigation or require that an independent investigation by outside counsel or other external consultants be undertaken. Additionally, the Bank’s General Counsel may authorize an independent investigation by outside counsel, even if not directed to do so by any other person.

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

## 2.5 COOPERATION

All persons involved in investigating any matter requiring reporting under the *Anti-Fraud Policy* or *AML Policy*, shall provide such information as may be requested to support compliance with regulations of the Financial Crimes Enforcement Network (“**FinCEN**”) and the filing of any reports required by the Finance Agency pursuant to the fraud reporting regulation or AB-2015-01.<sup>4</sup>

The Board recognizes, depending on the nature of the investigation, various Bank personnel have a need to be informed about the progress and findings of investigations, including without limitation the CIAO, President-CEO, AML Officer, Chief Risk Officer, Chief Financial Officer, Chief Accounting Officer CHR/DEI Officer, and others. Unless their potential involvement has been raised in any allegation or report relating to the matter, each such person shall be provided such information as they need to know to perform their duties (day-to-day duties, as well as any duties under the applicable Bank policy), including without limitation to facilitate any disclosures or other written certifications and representations to outside auditors, the Finance Agency or the SEC.

## 2.6 COMPLAINT RECORDKEEPING AND PERIODIC REPORTING

Bank management shall maintain an appropriate record of all reports received by their applicable departments, whether through EthicsPoint or otherwise. Bank management shall track such reports through their investigation and ultimate resolution, if involved with the investigation. A periodic summary of such reports shall be made to the

<sup>3</sup> The Bank will use EthicsPoint to track and retain all such reports, whether submitted via EthicsPoint or not.

<sup>4</sup> Such reporting may include the filing of a Suspicious Activity Report (“**SAR**”) with FinCEN or an Immediate Notification Fraud Report (“**INFR**”) with the Finance Agency pursuant to AB-2015-01. Under this advisory bulletin, an INFR must be filed within one calendar day of the date on which the “Bank becomes aware of a fraud or possible fraudulent activity, including employee misconduct.”



Audit Committee or other appropriate committee of the Board. The Internal Audit Department shall perform annual testing of the EthicsPoint reporting service.

## 2.7 NO RETALIATION

Retaliation, intimidation, or discriminatory conduct by any Employee, Director, or Advisory Council Member against any Covered Person who makes a report, raises a concern, provides information, or otherwise assists in an investigation related to a possible Code of Ethics or Applicable Code of Conduct violation, potential fraud, and/or suspected wrongdoing reported by the Covered Person in good faith<sup>5</sup> is strictly prohibited and will not be tolerated. In certain cases, such retaliation may in and of itself be a violation of law. Every manager has a responsibility to create a work environment in which Covered Persons can raise ethical and other concerns without fear of dismissal, retaliation or adverse action of any kind. Any Covered Person who believes that any retaliatory, intimidating, or discriminatory conduct has occurred or is likely to occur must immediately report the matter to the CIAO, the General Counsel, or the CHR/DEI Officer. Reports may also be made directly to the Chair of the Audit Committee. In certain cases, the Bank may retain a third-party audit or law firm to assist in internal and/or external investigations. The *Whistleblower Policy*, as well as the “No Retaliation” section of the Applicable Code of Conduct apply in the same manner to reports or information provided by any Covered Person in good faith to the 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.

## 2.8 DELEGATION OF DUTIES

The CIAO, the General Counsel, the AML Officer, and the CHR/DEI Officer may delegate their duties and functions under this Policy to Bank officers within their respective departments.

## 3 AMENDMENTS

The Board may approve amendments to this Policy at any time.

## 4 APPROVAL AND REVIEW CYCLE

This Policy, as amended, is effective as of March 18, 2022. The Audit Committee will review this Policy, recommend any changes, and recommend Board approval at least once per calendar year.

## 5 RELEVANT AUTHORITIES AND REFERENCES

Applicable rules and regulations of the Finance Agency and the SEC.

## 6 DOCUMENT CHANGE RECORD

Version	Date	Description	Reviewed by
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<sup>5</sup> “Good faith” means the Covered Person had a sincere and reasonable belief that the conduct they reported had actually occurred and had not intentionally, knowingly or recklessly omitted relevant facts of which they were aware so as to make their report misleading.



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
3.0	03/22/2019	Annual maintenance. Clarifications and/or enhancements made to internal roles, notification and handling of complaints and investigations, and delegation of duties.	Legal Compliance Audit Committee - Board
4.0	12/1/2020	Annual maintenance. Inclusion of Advisory Council Members, independent contractors and other individuals or entities doing business with the Bank; cross reference the Applicable Code of Conduct for consequences of violations, make roles and responsibilities consistent between this Policy and the Anti-Fraud Policy, make conforming changes for defined terms.	Legal Compliance Audit Committee – Board
5.0	3/19/21	Annual policy maintenance.	Legal Compliance Audit CommitteeBoard
6.0	3/18/22	Annual policy maintenance	Legal Compliance Audit Committee Board
7.0	3/24/23	Annual policy maintenance	Legal Audit Committee - Board