FHLBank Topeka

Anti-harassment & Equal Employment Opportunity Policy Statement

January 14, 2016

Policy Information

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Content Owner:	**Director of Human Resources and the Office of Minority and Women Inclusion (HR/OMWI)**
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Introduction

This FHLBank Policy, governed by the board of directors of the Federal Home Loan Bank of Topeka (FHLBank), establishes FHLBank's program for: (1) providing equal employment and contracting opportunities; (2) prohibiting discrimination on the basis of race, color, religion, sex, age, sexual orientation, national origin, ancestry, pregnancy, parental status, citizenship status, disability, genetic information or military status; and (3) promoting the full realization of equal employment opportunity and equal contracting opportunities through continuing outreach activities. It is further established to assist FHLBank in maintaining a work environment that encourages mutual respect and individual responsibility and is free from all forms of unlawful discrimination, abuse and other unlawful conduct, including harassment.

Purpose

The FHLBank is committed to: (1) ensuring a work environment free from all forms of unlawful discrimination, abuse and other unlawful conduct, including harassment. In meeting its fiduciary obligation to its stockholders to prudently manage its financial and human resources, FHLBank expects all business partners to promote a work atmosphere in which employees can feel productive, appreciated and respected; and (2) providing equal opportunities for all employees, prospective employees, contractors, and prospective contractors. To this end, FHLBank has designated HR/OMWI as responsible for performing the equal opportunity responsibilities pursuant to the Federal Housing Finance Agency's (FHFA's) Minority and Women Inclusion regulation and, with respect to employment matters, the Director of HR/OMWI as its equal employment opportunity (EEO) officer.

Scope

This Policy Statement is intended to impact all aspects of FHLBank's practices in the areas of employment, development, advancement and treatment of all FHLBank employees, including in particular, hiring and disciplinary action; compensation, assignment, or classification of employees; transfer, promotion, layoff, or recall; job advertising and recruitment; testing; use of company facilities; training and apprenticeship programs; fringe benefits; pay, retirement plans, and disability leave; and other terms and conditions of employment; and all aspects of FHLBank's contracting process. All employees, contractors, and consultants are responsible for ensuring compliance with this Policy Statement.

Policy

FHLBank will not tolerate any behavior from any employee who undermines its philosophy of mutual respect by deliberately causing another employee to feel embarrassed, humiliated or harassed. To this end, FHLBank specifically prohibits employees from acting in ways that could be construed as harassment or discriminatory conduct or that would create a hostile, intimidating or demeaning environment for employees, applicants or others with whom FHLBank does business. Nor will FHLBank tolerate any form of harassment or unlawful discrimination against our employees by vendors, stockholders, clients, customers or visitors.

Harassment or discriminatory conduct consists of unwelcome conduct, whether verbal, physical, or visual, that is based upon a person's protected status, such as race, color, religion, sex, age, sexual orientation, national origin, ancestry, pregnancy, parental status, citizenship status, disability, genetic information or military status. Such conduct includes abusive, demeaning or derogatory comments or other behaviors that show hostility or dislike of an individual because of his or her protected status or that of his or her relatives, friends, or associates. In particular, sexual harassment may include unwelcome flirting or sexual advances, requests for sexual favors, displaying sexually suggestive material in the workplace and using offensive words or gestures of a sexual nature. Non-conventional types of sexual harassment would be a man harassing a man or a woman harassing a woman, both of which are prohibited under the terms of this Policy. It is the effect on the work environment, not just intent, that is relevant in providing a harassment-free workplace. To that end, employees must be aware that they are responsible for their comments and actions and should respect the wishes of others who do not share the same feelings or sense of humor.

In addition, this Policy prohibits any type of improper harassment of FHLBank employees or discriminatory conduct by third parties in the course and scope of employment. If you believe you are being harassed at work by an individual who does not work at FHLBank, you should report the conduct as described in this Policy.

Through its philosophy of mutual respect, FHLBank underscores to employees of all levels the seriousness with which they, their corporate peers and the legal community regard all forms of harassment, including but not limited to sexual harassment, both for the protection of employees and stockholders. By educating employees about the issues, emphasizing the importance of mutual respect and accentuating the need for individual responsibility, senior management hopes to enhance an already pleasant work environment in which employees and FHLBank can best achieve their personal and collective goals.

This Policy shall be distributed to all FHLBank employees at least annually, and shall be posted in FHLBank's physical facilities, including through alternative media formats, as necessary, and shall be posted on FHLBank's website.

Any person who believes he or she has been discriminated against in violation of this Policy Statement is encouraged to contact the Director of HR/OMWI in the manner described below. The Director of HR/OMWI is fully authorized to take whatever lawful, remedial or preventive measures necessary to ensure that both the letter and spirit of this Policy Statement are observed.

Reporting of Complaints and Concerns and Investigations

Employees must report any action that may violate the Policy of which they are aware directly to the Director of HR/OMWI, except in the case of assertions of actions involving HR/OMWI, in which case, employees may report such complaints or concerns to the Legal department. Or if the employee prefers, he or she may report the action to his or her supervisor, who in turn must report such actions directly to the Director of HR/OMWI or the Legal department, as applicable. Alternatively, an employee may address a concern about action toward him or herself by telling

an offending party that his or her behavior is unwelcome; however, if that statement of protest does not dissuade the offensive party from further prohibited conduct, s/he should immediately report the conduct as set forth above. After receiving any report, the Director of HR/OMWI, in conjunction with the Legal department, shall conduct an investigation, taking steps to ensure that the offending party is not prematurely notified of such, and take whatever remedial or preventive measures are necessary to ensure that both the letter and the spirit of the Policy are enforced.

Employees, applicants, contractors, or potential contractors must report any action that may violate this Policy Statement of which they are aware to the Director of HR/OMWI with regard to contracting.

No Retaliation Permitted

Retaliation or reprisal against anyone for reporting discrimination or harassment, for telling the offending party that his or her conduct is unwelcome, or for cooperating with an investigation of a complaint of discrimination or harassment, is expressly and strictly prohibited. Reports of possible retaliatory behavior should be made to your supervisor or to the Director of HR/OMWI.

Exceptions/Violations

There are no exceptions to this Policy.

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

Training

The Director of HR/OMWI shall conduct, or coordinate, annual training sessions for employees regarding the requirements of this Policy Statement.

Limitation of Expressed Rights or Benefits

This Policy Statement 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, officers, employees, agents or any other person.

Policy Review

This Policy shall be reviewed annually and revised as needed by the Director of HR/OMWI. Following such review, the Policy shall be submitted for review and approval by the Policy Oversight Group. This Policy Statement shall be re-endorsed by the Chief Executive Officer (CEO) and re-approved by the board of directors annually.

I hereby certify that the above is a true and correct copy of the policy statement approved by the Executive committee of FHLBank's board of directors on January 14, 2016.

1/20/16
Date

Secretary to the Board

I hereby endorse the above Anti-Harassment & Equal Employment Opportunity Policy Statement.

1-20-2016
Date

Andrew J. Jetter
President & CEO