

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name Compeer Financial, ACA (f/k/a AgStar Financial Services, ACA)		2 Issuer's employer identification number (EIN) 41-0696305	
3 Name of contact for additional information Jase Wagner		4 Telephone No of contact 952-997-1272	
6 Number and street (or P O box if mail is not delivered to street address) of contact 1921 Premier Drive		5 Email address of contact Jase.Wagner@afs.compeer.com	
8 Date of action July 1, 2017		7 City, town, or post office, state, and Zip code of contact Mankato, MN 56001	
10 CUSIP number		9 Classification and description Stock issued pursuant to merger with 1st Farm Credit Services, ACA	
11 Serial number(s)		13 Account number(s)	
12 Ticker symbol			

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ The organizational action is the merger of 1st Farm Credit Services, ACA (EIN 01-0612879) ("1st") with and into Compeer Financial, ACA (f/k/a AgStar Financial Services, ACA) (EIN: 41-0696305) (the "Issuer") (the "Merger") Pursuant to the Merger, by operation of law, each share of voting common stock in 1st was converted into one share of voting common stock in the Issuer, and each participation certificate (non-voting common stock) was converted into one participation certificate in the Issuer (the "Exchange") The Merger qualifies as a reorganization under Section 368(a)(1)(A) of the Internal Revenue Code of 1986, as amended. No holder of stock in 1st received "boot" or other non-stock consideration in the Merger.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U S taxpayer as an adjustment per share or as a percentage of old basis ▶ Each holder's basis in each share of common stock or participation certificate received in the Exchange is equal to the holder's adjusted tax basis in the 1st common stock or participation certificate surrendered therefor.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ The Issuer issued one share of common stock and one participation certificate for each share of 1st common stock and participation certificate, respectively, surrendered in the Exchange

Part II Organizational Action (continued)

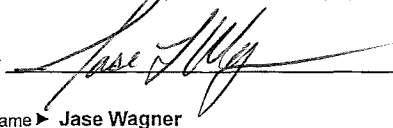
17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶
Sections 354(a)(1), 358(a)(1), 368(a)(1)(A)

18 Can any resulting loss be recognized? ▶ Pursuant to Section 354(a)(1), no loss may be recognized on the Exchange

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ As a party to the Merger, 1st will report the Merger as a tax-free reorganization under Code Section 368(a)(1)(A) on its U S. federal income tax return for the period ending on the merger date.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge

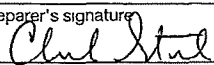
Sign Here

Signature ▶ 
Print your name ▶ Jase Wagner

Date ▶ 8/4/17

Title ▶ SVP & CFO

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
Charles Stark		7/27/17		P00427247
Firm's name ▶ AgriBank, FCB	Firm's EIN ▶ 41-1717543		Phone no 651-282-8726	
Firm's address ▶ 30 E 7th St, Suite 1600, St. Paul, MN 55101				