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CORPORATE POLICY

Subject: Complaint Policy for Accounting, Internal Accounting Controls and Auditing Matters Pertaining to Freddie Mac's Business

Policy Number: 1-150

Control Point: Chief Compliance Officer

Approval Authority: The Audit Committee of the Board of Directors

Signature: Robert Bostrom

Summary of this Policy

In accordance with the Sarbanes-Oxley Act of 2002 and the corporate governance rules of the New York Stock Exchange, this policy sets forth corporate policy, establishes processes, and defines responsibilities for the receipt, retention and prompt resolution of complaints pertaining to accounting, internal accounting controls and auditing matters pertaining to Freddie Mac or its business, including the confidential, anonymous submission by employees of concerns regarding questionable accounting or auditing matters.

Retaliation against any person who in good faith reports an Accounting Matter (as defined below) or participates in any way in an investigation of an Accounting Matter is prohibited.

I. Purpose of this Policy

The Sarbanes-Oxley Act of 2002 and the corporate governance rules of the New York Stock Exchange require corporations to establish processes for the receipt, retention and prompt resolution of complaints pertaining to accounting, internal accounting controls and auditing matters (collectively "Accounting Matters").¹ Given the special nature of Accounting Matters, Freddie Mac has established procedures tailored to their handling and resolution. The corporation reserves the right to conduct an investigation of any Accounting Matter at any time for any reason regardless of whether a person or entity covered by this Policy files or otherwise initiates a complaint.

The procedure for handling an Accounting Matter will vary depending upon its specific attributes. Accounting Matters that are considered "Major Accounting Matters" are handled differently than "Non-Major Accounting Matters." For purposes of this Policy, Major Accounting Matters are defined as Accounting Matters that involve (1) a decision made by an Officer; or (2) intentional misconduct or misrepresentations; or (3) noncompliance with a "Regulatory Obligation." Regulatory Obligations are defined as Accounting Matters that involve (1) applicable legal or regulatory requirements or generally accepted accounting principles ("GAAP") or (2) corporate policies or procedures pertaining to such requirements or to GAAP.

¹ Examples of areas in which Accounting Matters may arise include: the preparation, evaluation, review or audit of any financial statement of the Company; recording or maintaining of financial records of the Company; reporting of the Company's financial condition; audit reports; and issues involving external auditor independence.



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CORPORATE POLICY

II. Roles and Responsibilities

Employees who become aware of wrongdoing are strongly encouraged to report the matter immediately. The same applies to “non-employees” as that term is defined in Corporate Policy 3-221.

Members of Management² are required to report any wrongdoing that comes to their attention whether they witness it first-hand or learn about it through other means, including communications with employees. They also must report the basis for their concern.

Attorneys who are Freddie Mac employees should consult Policy 7-200, Compliance with the Securities and Exchange Commission’s Rule 205 “Implementation of Standards of Professional Conduct for Attorneys,” to determine whether they have reporting obligations in addition to those set forth in this Policy.

Individuals are urged to report Accounting Matters immediately after they become aware of their concern in order to facilitate timely review of the allegations.

III. Where to Report Accounting Matters

Corporate Compliance is the central receiving point for allegations of conduct that may violate the Code of Conduct, including Accounting Matters. Employees may use any of the following mechanisms to report wrongdoing to Corporate Compliance:

- Call the Compliance & Ethics Helpline (1-877-301-CODE). This third-party vendor service is available 24 hours a day, 365 days a year. Callers may remain anonymous (“Caller ID” is not available);
- Contact a member of Corporate Compliance Division staff;
- Send an e-mail message to compliance_helpline@freddiemac.com;
- Complete and submit the “Ask Corporate Compliance” form available on Corporate Compliance’s web site on HomeFront (submissions may be made anonymously);
- Send a fax to 1-800-504-5909; or
- Send written correspondence to

Corporate Compliance
Freddie Mac
8200 Jones Branch Drive
M/S 434
McLean, VA 22102;

Employees may also report Accounting Matters to one of the following groups or individuals (as noted below, however, these groups or individuals must in turn notify Corporate Compliance if the alleged activity constitutes a Major Accounting Matter):

² Members of Management include Officers and employees who are managers or supervisors. For purposes of this Policy, an employee is considered a manager or supervisor if he/she has actual authority to (1) undertake a tangible employment action affecting an employee, such as hiring, firing, promoting, demoting, reassigning or compensating or (2) direct the daily work activities of other Freddie Mac employees.

- Any Officer of Freddie Mac (i.e. vice presidents and above);
- Your immediate Manager or Supervisor or the next-level Manager or Supervisor;
- The Employee Relations Department of Human Resources
- The Chairman of the Audit Committee of the Board of Directors (send correspondence c/o the General Counsel and Corporate Secretary, and mark it “Confidential”).

Non-employees who provide services to Freddie Mac and any other third party should submit allegations pertaining to Accounting Matters to the Corporate Compliance Division or through the Compliance & Ethics Helpline.

IV. Anonymity/Confidentiality

Freddie Mac’s reporting mechanisms allow for anonymous reports of wrongdoing. An employee who calls the Compliance & Ethics Helpline will be connected to a third-party vendor, unless the caller affirmatively chooses to be connected directly to Corporate Compliance. Callers who speak to the third-party vendor may remain anonymous.³ Similarly, when written messages are sent via the “Ask Corporate Compliance Form” on HomeFront, the sender’s identifying information does not appear on the message received by Corporate Compliance unless the sender chooses to supply his/her name. (Employees should be aware that this is not the case for messages sent to compliance_helpline@freddiemac.com where the sender’s e-mail address is displayed.)

The identity of callers who identify themselves will be treated with sensitivity consistent with applicable law and good business practices. Questions regarding confidentiality should be directed to Corporate Compliance.

V. Handling of Major Accounting Matters

After becoming aware of a Major Accounting Matter, whether by receipt of a complaint or otherwise, a Member of Management is required to report the complaint and/or matter to Corporate Compliance.⁴ After consulting with the General Counsel and the General Auditor, the Chief Compliance Officer shall, in turn, report the matter and a proposed internal investigating entity, if any, to the Chairman of the Audit Committee.

A “Major Accounting Matter” pertaining to:

- Applicable legal or regulatory requirements or
- Intentional misconduct or misrepresentations

shall be investigated either by, or at the direction and under the supervision of, the Legal Division, in order for it to advise the company about its legal or regulatory obligations. In the event that the matter involves legal advice provided by the Legal Division or an action (or failure to take an action) by any Officer to whom the General Counsel directly or indirectly reports, the General Counsel and the Chief Compliance Officer shall report that fact to the Chairman of the Audit Committee and the Chairman shall decide the appropriate investigating entity.

³ Callers who, when using the Compliance and Ethics Helpline, choose to be connected directly to Corporate Compliance staff may also withhold their names.

⁴ In the event that an employee of the Corporate Compliance Division is alleged to have participated in the activity giving rise to a Major Accounting Matter, the allegation must be brought to the attention of the General Counsel and the General Auditor rather than Corporate Compliance.

A “Major Accounting Matter” pertaining to:

- Generally accepted accounting principles (“GAAP”) or corporate policies or procedures pertaining to GAAP or
- A decision made by an Officer about any other matter not otherwise within the purview of the Legal Division

shall be investigated by the General Auditor. In the event that the Chief Compliance Officer or the General Auditor learns that the matter involves an action (or failure to take an action) by the General Auditor, a person reporting to the General Auditor or any Officer to whom the General Auditor indirectly reports, the General Auditor and the Chief Compliance Officer shall report that fact to the Chairman of the Audit Committee and the Chairman shall decide the appropriate investigating entity.⁵

The investigator of the matter may use the services of any other individual or entity, internal or external, that his or her Division Head determines is appropriate to investigate and resolve it. Internal personnel, when conducting such assigned tasks, shall report to the investigator for purposes of the investigation, and not through their usual management structure.

The nature of the investigation will depend on the facts of the complaint. In general the investigator shall:

- Interview the complainant and any other individuals who may have information pertinent to the subject matter of the complaint;
- Collect, review and preserve all relevant documents and other records, including relevant e-mail and voice-mail messages; and
- Give individuals potentially adversely affected by the outcome of the investigation the opportunity to respond to information obtained by the investigator during the course of the investigation.

Generally, an investigation should be completed within 30 business days of its initiation, unless circumstances reasonably prevent completion of the investigation within that time period.

Once the investigation is completed, the function responsible for investigating a matter shall independently report the results to the Audit Committee, the Chief Compliance Officer, the General Counsel, the General Auditor and other appropriate Members of Management.

VI. Handling of Non-Major Accounting Matters

Any complaint about a Non-Major Accounting Matter may be resolved by the business area and level of management appropriate to resolve the matter. If a Member of Management is notified or becomes aware of a complaint or other concern about an Accounting Matter that he or she reasonably and in good faith determines is not a Major Accounting Matter, business area management familiar with the matter shall work diligently to resolve the concern consistent with applicable laws, policies and the company’s business interests. It is not necessary for a Member of Management to report a Non-Major Accounting Matter to Corporate Compliance.

If Corporate Compliance receives an allegation involving a Non-Major Accounting Matter through one of its complaint intake mechanisms,⁶ the Chief Compliance Officer, or his/her designee, will refer the matter to the appropriate business

⁵ Where Internal Audit is assigned to investigate a Major Accounting Matter, the General Auditor will appoint an individual within Internal Audit who has no conflict of interest with respect to the matter to investigate.

⁶ Corporate Compliance and Members of Management may consult with Internal Audit with respect to the proper classification of Accounting Matters.

unit management for resolution, unless the Chief Compliance Officer determines that such referral is not appropriate under the circumstances.⁷ Corporate Compliance will notify Internal Audit that the matter has been received and to whom it has been assigned for resolution. Management must keep Corporate Compliance apprised of the status and/or resolution of any allegation it receives from Corporate Compliance for resolution.

VII. Duty to Cooperate

All employees have an obligation to cooperate fully, promptly and truthfully in any investigation conducted pursuant to this Policy.

VIII. Periodic Reports to the Audit Committee

Not less than once per calendar quarter, the General Auditor shall report in writing to the Audit Committee a summary of complaint activity pertaining to Major Accounting Matters, including the issue(s) raised, the entity conducting the investigation, the status of the investigation, and the resolution or expected date of resolution. Such reports shall not be submitted in the absence of relevant complaint activity.

Any internal or external entity directed by the Chairman of the Audit Committee to conduct an investigation in lieu of Internal Audit shall make a written report of such matter to the Audit Committee in the same manner and frequency as the above report. The Chairman shall include with the report the basis for his/her decision to use such internal or external entity to investigate and resolve the matter.

In connection with the Audit Committee's review of the company's quarterly reports on Form 10-Q and annual reports on Form 10-K (including the management certifications that are required to be included in such reports), the Chief Compliance Officer, General Auditor and General Counsel shall report jointly in writing to the Audit Committee concerning the existence and current status of any complaints alleging any fraud, whether or not material, that involves management or other employees who have a significant role in the company's internal control over financial reporting. A copy of this report will be provided to the Chief Executive Officer, the Chief Financial Officer and the Corporate Controller and Principal Accounting Officer.

IX. Non-Retaliation and Handling of Retaliation Complaints

Retaliation will not be tolerated against any employee who, based on his or her reasonable good faith belief, reports a concern about wrongdoing. It is also impermissible to retaliate against an employee or vendor who assists or otherwise participates in the resolution of a complaint or in an internal or external investigation or proceeding pertaining to a report of wrongdoing. Members of Management must ensure that the employees they supervise diligently comply with these non-retaliation obligations. A Member of Management's lack of diligence in ensuring compliance with these non-retaliation obligations may be grounds for discipline, up to and including dismissal.

Any employee who reasonably and in good faith believes that any retaliatory, intimidating or discriminatory conduct has occurred or is likely to occur as a result of their or another's report of wrongdoing or participation in the investigation and/or resolution of such report is encouraged to report it using the complaint procedures set forth in this Policy.

⁷ The Chief Compliance Officer will consult with the Legal Division or others as necessary in making such a determination.



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CORPORATE POLICY

Complaints of retaliation will be appropriately investigated either by, or at the direction and under the supervision of, the Legal Division when the retaliation complaint implicates the company's obligations pursuant to the non-retaliation provisions of the Sarbanes-Oxley Act of 2002. The Compliance Division, or the Human Resources Division acting at the direction of the Compliance Division, shall investigate all other retaliation complaints.

Persons who believe they have been subject to retaliatory or discriminatory conduct as a result of disclosing information about Accounting Matters (as defined in Section VI) may also have the right to file a complaint with the United States Department of Labor, Occupational Safety and Health Administration ("OSHA"). A list of the addresses and phone numbers of OSHA offices can be found on OSHA's website: <http://www.osha.gov/>. Strict time limits govern when a complaint must be filed with governmental agencies, and the individual is responsible for complying with these time requirements or risks being barred from proceeding with the complaint under applicable law. Filing a complaint with OSHA is not a substitute for filing an internal complaint under this Policy, nor is filing an internal complaint under this Policy a substitute for filing a complaint with OSHA.

X. Cross References and Related Policies and Procedures

Policy 1-140 Freddie Mac Code of Conduct
Policy 7-200 Compliance with the Securities and Exchange Commission's Rule 205 "Implementation of Standards of Professional Conduct for Attorneys"

XI. Reservation of Rights

The Company reserves the right in the sole exercise of its discretion to amend or modify this Policy at any time for any reason. Nothing in this Policy creates a contract between the Company and its employees, or otherwise alters the at-will status of employment.

Effective Date: September 4, 2008

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Replaces Policy 1-150 dated December 20, 2007