

Freddie Mac Supplier
Code of Conduct

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A Message from Freddie Mac Leadership



At Freddie Mac, our mission is to provide liquidity, stability, and affordability to the U.S. housing market, equitably and responsibly, in all economic conditions. Central to achieving this mission is our commitment to upholding the highest standards of integrity, transparency, and ethical behavior in all aspects of our operations. This commitment extends to our relationships with our suppliers, who play a vital role in our success.

At Freddie Mac, we partner with a diverse and innovative supply base that shares our dedication to excellence and ethical practices. We collaborate with our suppliers to protect the future of housing in a changing world, while promoting inclusive communities and operating responsibly. We believe that strong, principled partnerships are the foundation of sustainable success and drive our collective ability to meet the needs of the communities we serve. We are also dedicated to ensuring that our business practices reflect our core values of fairness, respect, and accountability. Our Supplier Code of Conduct outlines the ethical principles and standards we expect from our suppliers, emphasizing our mutual commitment to responsible business conduct.

Together, we strive to foster a collaborative environment where ethical conduct is not just encouraged but expected. This Code of Conduct is designed to guide our suppliers in maintaining the high standards of ethical, sustainable behavior that align with Freddie Mac's values and regulatory requirements.

We appreciate your adherence to these guidelines and look forward to working with you to achieve our shared goals with integrity and respect.

Thank you for your commitment to ethical business practices.

William Bagley
Vice President,
Enterprise Supply Chain

Michael Levin
Vice President,
Compliance & Ethics

Carol Khalil
Vice President,
Corporate Sustainability

Our Mission



Our Company

At Freddie Mac, we make home possible for America’s families every day, with everything we do.

Our Mission

While our roles are diverse, our mission — to make home possible for more people throughout the country — is central to everyone’s work.

While our mission is constant, the way we fulfill it can change over time. In today’s economic climate, we are focused equally on strategic priorities: affordable housing, risk management and financial strength.

As always, we rely on our people — our fourth strategic priority — to execute on these priorities and, together, to bring our mission to life.



Supplier Code of Conduct Principles



We require our suppliers to comply with all applicable laws, regulations, and contractual requirements. With respect to the principles in this Supplier Code of Conduct that may not be legally or contractually required, we expect our suppliers to uphold the principles outlined in this Supplier Code of Conduct, and we encourage them to set similar expectations with their own suppliers.

Freddie Mac expects our suppliers to maintain an ethics and compliance program that is commensurate with the size and nature of their business. The program should include policies and other processes to ensure compliance with laws, regulations, and the expectations related to or addressed expressly within this Supplier Code. This should include systems to monitor their compliance with these standards and take appropriate action to correct identified deficiencies and incidences of noncompliance.

Compliance with Laws

Suppliers shall comply with all federal, state, and municipal laws and regulations regarding their business practices, including but not limited to:

- Anti-discrimination – Fair Housing Act and the Equal Credit Opportunity Act
- Office of Foreign Assets Control (OFAC) Regulations and Specially Designated Nationals (SDN) List
- Environmental laws, both state and local

The above list is not exhaustive. Suppliers should consult with their legal counsel regarding laws and regulations applicable to their activities and services provided to Freddie Mac.



Ethical Conduct, Conflict of Interest, and Responsibility of Suppliers

Suppliers are expected to conduct themselves fairly and honestly in all dealings with Freddie Mac and their employees, other customers, competitors, investors, and the public. Many of the rules and prohibitions expressed in this Supplier Code of Conduct are derived from this principle.

To eliminate the possibility or even the appearance of any conflict of interest, when conducting business with Freddie Mac, the supplier must deal fairly and honestly with everyone with whom it interacts. Suppliers must always disclose to Freddie Mac situations that could be construed as a potential conflict of interest prior to the situation occurring. If there are any questions as to whether a situation constitutes a potential conflict of interest, suppliers should contact Freddie Mac Enterprise Supply Chain.

Suppliers should note that certain employees are required to abide with six-month cooling-off periods following the termination of their employment with Freddie Mac. The cooling-off periods restrict specific types of engagement with Freddie Mac on behalf of the former employees' new employers. Knowing violations of the cooling-off periods may result in legal action. Suppliers may direct any questions about these restrictions to the [Compliance & Ethics Helpline](#).

Supplier Diversity

Our commitment to prioritizing Diversity, Equity, and Inclusion (DEI) is reflected by our focus on supplier diversity, which includes our Supplier Diversity Program.

- Suppliers should embrace diversity in their own business practices and document their diversity and inclusion approach, including ways to improve their diversity and inclusion standards.
- In accordance with 12 CFR § 1223.21(b)(9) — “Promoting diversity and ensuring inclusion in all business and activities” — of FHFA’s regulation on minority and women inclusion, and the Housing and Economic Recovery Act of 2008, 12 U.S.C. § 4520 (HERA), suppliers should practice the principles of equal employment opportunity and non-discrimination in all business activities and contractually require each subcontractor the supplier engages to provide services or goods to Freddie Mac to practice the principles of equal employment opportunity and non-discrimination in all its business activities.
- Upon request, suppliers should provide Freddie Mac with information and appropriate certifications regarding: (1) their diversity status; (2) the diversity status of subcontractors the supplier engages to provide services or goods to Freddie Mac; (3) the amounts Freddie Mac pays to the supplier for services and goods from diverse subcontractors; and (4) any other information Freddie Mac requests to comply with HERA and applicable diversity and inclusion regulations.



Fairness

All dealings by suppliers with Freddie Mac or on behalf of Freddie Mac must be fair and honest. Suppliers will not take advantage of anyone through manipulation, abuse, impermissible use of confidential information, misrepresentation, or concealment of material facts necessary to understand a proposed business transaction, unfair methods of competition, or other unfair, deceptive, or abusive acts or practices.

Confidentiality and Privacy

As a result of Freddie Mac's position in the financial services industry, suppliers could be exposed to information of unusual sensitivity, including material nonpublic information, protected personal information, and confidential supervisory information as defined under the provisions of 12 C.F.R. Part 1214. Suppliers must therefore keep in mind the guidelines and policies delineated below when dealing with such information.

1. Suppliers must treat all information learned or obtained in connection with an engagement with Freddie Mac ("Freddie Mac Information"), including anything seen or heard while on site and information from third parties, as confidential unless it is already publicly available. A supplier's obligation to protect such information in its possession or control continues to apply even after an engagement with Freddie Mac ends.



2. Suppliers may use Freddie Mac Information only to the extent necessary to perform work for Freddie Mac and disclose such information only to those individuals who have a need to know such information in connection with their duties to Freddie Mac. Specific non-disclosure and other requirements (including time-sensitive requirements regarding data breach notifications) may apply where information is sensitive or subject to legal or contractual restrictions, including the categories of information listed below.
 - “Material Nonpublic Information” or “MNPI.”
 - “Protected Personal Information” or “PPI,” which is the term Freddie Mac uses to identify information that can be used to identify, contact, or locate an individual, or to distinguish or trace an individual’s identity.
 - “Confidential Supervisory Information” that Freddie Mac provides to, prepares for, or receives from the Federal Housing Finance Agency (“FHFA”), as addressed in FHFA’s rules governing the disclosure of FHFA non-public information.
3. Suppliers will comply with all legal requirements applicable to Freddie Mac Information, including applicable privacy, data security, breach notification, and data disposal laws and regulations.
4. Suppliers will return to Freddie Mac (and, with respect to items that cannot be returned, such as electronic copies, destroy) all Freddie Mac Information (including all copies) promptly upon request.
5. Suppliers are not limited in providing information regarding potential wrongdoing to a government agency.

Suspicious Activity, Including Fraud, Money Laundering, and Dishonesty

Acts of fraud, dishonesty, money laundering, or financial crimes are not tolerated. Suppliers are responsible for assisting Freddie Mac’s efforts to identify suspicious activity such as mortgage-related fraud or money laundering and have a responsibility to report any actual or possible suspicious activity. Suspicious activity includes attempts to conceal the identity, source, and/or destination of illicitly obtained money.

Bribes and Kickbacks; Invoices

Our suppliers must comply with the U.S. Foreign Corrupt Practices Act and other applicable anti-corruption laws, directives, and regulations that govern their operations and ours. Suppliers involved in the giving or receiving of a bribe or kickback or padding or otherwise falsifying invoices are subject to immediate termination.



Gifts

Giving and/or receiving of gifts could be construed as trying to influence the business relationship between Freddie Mac and suppliers; therefore, suppliers must be acutely sensitive to the appearance of these actions. Suppliers must avoid offering Freddie Mac employees any gift that is frequent, lavish or extravagant, or in clear violation of our policies. Additionally, suppliers should avoid offering gifts during open negotiations, major contract renewals, or during active requests for proposal periods.

Freddie Mac employees are prohibited from receiving cash in any amount (including speaker fees); cash equivalents in any amount (including gift certificates, gift cards, etc.); discounts, more favorable loan terms, or other benefits that are unavailable to all employees; personal travel and vacations; anything prohibited by law or regulation; anything that can be perceived as a bribe, payoff, kickback, or an attempt to receive other improper influence; and any gift, meal, or entertainment that is contrary to Freddie Mac's values. Suppliers should never give gifts to a Freddie Mac employee's family member(s).

Freddie Mac employees are prohibited from attending any events with a primary stated purpose of developing and advocating for (a) public policy; or (b) legislative, regulatory, or political positions and issues. Suppliers must not knowingly invite Freddie Mac staff to attend such events.

Environmental Sustainability

We encourage our suppliers to support environmental sustainability by reducing the environmental impacts of their business operations, including (but not limited to) the following principles:

- Measure and reduce their greenhouse gas (GHG) emissions, energy and water consumption, and waste stream.
- Integrate climate risk management into business decisions to minimize and mitigate climate-related risks.
- Provide transparency around the short- and long-term efforts and progress of environmental policies and practices.



Workplace Environment and Working Conditions

We support and encourage our suppliers to treat people fairly and with respect and dignity. Our suppliers should act professionally in all interactions and create a work environment that values everyone.

Suppliers should encourage a supportive working environment that is free from harassment, intimidation, and discrimination. Suppliers should not discriminate based on race, color, religion, ethnicity, sex, pregnancy, age, national origin, disability, sexual orientation, gender identity/expression, parental status, marital status, military service or veteran status, genetic information, or any other status protected by applicable law. Suppliers must comply with all applicable laws relating to discrimination in hiring, equal employment opportunities, harassment, and retaliation.

Suppliers must comply with all applicable labor and employment laws and regulations, including restrictions on forced and child labor (in accordance with ILO Forced Labor Convention [No. 29] and ILO Minimum Age Convention, respectively). Suppliers must also comply with applicable laws and regulations regarding minimum wages, work hours and time, and other applicable labor and employment laws and regulations.

We encourage suppliers to provide a way for their employees to raise legal or ethical issues or concerns without fear of retaliation. We expect our suppliers to take action to prevent, detect, and correct any retaliatory actions.



Questions

Commitment to Ethical Practices

We encourage all our suppliers to integrate these guidelines into their daily operations, fostering a culture of integrity, transparency, and respect. Adhering to these principles helps us build strong, sustainable, and mutually beneficial partnerships.

Addressing Non-Adherence

In the event that a supplier does not adhere to these guidelines, we are committed to working collaboratively to address and resolve any issues. Potential actions may include:

- **Dialogue and Support:** We will engage in open dialogue to understand the reasons for non-adherence and provide support to help suppliers align with the guidelines.
- **Improvement Plans:** We may work together to develop and implement improvement plans aimed at addressing specific areas of concern and enhancing compliance with the Code.
- **Review of Relationship:** Depending on the nature and frequency of non-adherence, we may review our business relationship to ensure alignment with Freddie Mac's values and expectations.

Maintaining Open Communication

We believe that clear communication and cooperation are key to maintaining ethical standards. Suppliers are encouraged to proactively address any concerns and seek guidance when needed. Open communication helps us identify and mitigate potential issues before they escalate.

Reporting Concerns

Suppliers and their employees are invited to report any concerns or potential issues related to this Code of Conduct to Freddie Mac. Reports can be made confidentially and without fear of retaliation. We value transparency and are committed to addressing any concerns promptly and fairly.

We appreciate your commitment to these guidelines and look forward to our continued collaboration based on mutual respect and shared values. For any question, you can reach out to us through our **Corporate Helpline: 800-424-5401**.