

# At Our Best



## Code of Conduct



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## A Message from the CEO

Dear Colleagues,

Freddie Mac, while a commercial company, was established for a clear public purpose. This is core not only to what we do, but also to how we do it. Under conservatorship, in particular, we as a company focus on both building “A Better Freddie Mac” and equally working to create “A Better Housing Finance System.”

To deliver on these twin goals, we need to be At Our Best as individuals, as teams, and as an entire organization. All of us need to act as leaders and place trust, honesty and respect at the forefront of our relationships. Freddie Mac’s Personal Competencies, which we introduced in early 2016, help define the actions that define At Our Best.

Corporate Values are all about “how we do it.” We have updated our Corporate Values to align better with the Personal Competencies and illustrate that, to achieve our objectives, we must all exhibit Accountability and Integrity, Leadership, Partnership and Execution.

We also have updated this Code of Conduct to make it more user-friendly. It is more concise, and we moved from a rules-based approach towards a principles-based one. Now you can use the Code as an everyday guiding tool to help you navigate what’s right in a particular situation and reduce legal and ethical risk.

Knowing when to seek guidance or to speak up is also an important part of everyone’s personal accountability. I am committed to maintaining a culture where people are encouraged to seek advice, voice concerns or report possible misconduct and are protected from retaliation. If you have questions or if something doesn’t seem right to you, please contact our [Compliance & Ethics Helpline](#).

Thanks for helping to make Freddie Mac a better place for all of us to work.

A handwritten signature in black ink that reads "Don Layton".

Donald H. Layton  
Chief Executive Officer

## Freddie Mac’s Values

### **Accountability and Integrity**

We reliably deliver on our commitments and always demonstrate high ethical standards.

### **Leadership**

We lead by example and inspire others to lead, modeling the right behaviors to achieve our twin goals of building A Better Freddie Mac and creating A Better Housing Finance System.

### **Partnership**

We place trust, respect and honesty at the forefront of our relationships and encourage everyone to speak up and be heard.

### **Execution**

We are proactive, anticipating obstacles and challenges, and manage our work and our teams to deliver real results.

# Introduction

## Our Code is a Foundation for Ethical Conduct

Being **At Our Best** means we conduct business ethically and in compliance with the law, our policies and our Values. It means we consistently uphold the responsibilities that we have to each other, our business partners, our competitors and our customers. Good ethics are good for business.

But what is right, fair or compliant isn't always obvious, especially in the face of conflicting priorities or business pressures.

This Code outlines certain critical expectations for your actions at work. The Code is not just a set of rules to follow – it's a foundation for ethical conduct at work.

### ■ Does the Code apply to me?

The Code applies to all full- and part-time employees, including senior management. If you are an employee providing services under the Financial Agency Agreement between Freddie Mac and the Department of the Treasury, you are also subject to the Freddie Mac Making Home Affordable Code of Conduct, which contains more restrictive rules in some areas.

We also expect that those who work with Freddie Mac, including contingent workers, independent contractors and consultants, will embrace the spirit of the Code and adhere to its standards.

### ■ How should I use the Code?

To be at YOUR best, read the Code now, taking time to understand our expectations and how these might apply to your role at Freddie Mac.

Then consult the Code in situations where you're not sure of the right answer – especially in situations that might present legal or ethical risks to you or to the business.

### ■ What if I can't find an answer in the Code?

While the Code strives to be comprehensive, it can't anticipate every situation that you may encounter. For additional information, review the relevant policies, click on the following infographic icons as they appear throughout this Code, or consult the [Ethics Helpline](#) for guidance.



Continued on next page.

## Bringing Our Values Home

Our Code requires that each of us demonstrate good judgment in our decisions and actions at work – not once in a while, but consistently.

To do this, we must be able to accurately evaluate situations and make good choices.

If you're facing a situation where the right choice is not clear, take a moment to assess your options in terms of our Values.

### Accountability and Integrity

Am I making a decision that is in the best interest of Freddie Mac?

### Leadership

Am I modeling good behavior?

### Partnership

Am I working with the right people and consulting the right resources to answer my questions or help solve my dilemma?

### Execution

Am I doing my part to support an ethical culture?

For additional insight, consider the ethical issues at stake. Ask:

**Right versus wrong:** Am I being asked to do something that might be inappropriate? Are there legal or ethical concerns?

**Potential consequences:** Could someone or something be harmed by my decision?

**Reputational effect:** Would others understand my decision? Could I explain it to my manager, a friend or someone I admired? Could the decision reflect poorly on me or Freddie Mac?

**Due diligence:** Have I verified important facts and assumptions? If I'm not sure after trying to verify, have I asked?



■ **Where can I find our corporate policies?**

Corporate policies are available on [HomeFront](#). Corporate policies support the Code by presenting additional detail on particular topics, and also cover other topics not contained in the Code. Relevant policies are [indexed](#) at the end of the Code, to make it easy to consult a specific resource when you need more detailed information. Each employee is responsible for understanding and following all of Freddie Mac's corporate policies.

■ **What happens if someone violates the standards in our Code?**

Complying with the Code of Conduct is a condition of employment. Failure to follow the Code may result in corrective action, up to and including termination.

■ **Whom can I talk to if I have questions or concerns?**

It can be difficult to speak up if you have questions or concerns. But our Values require that we do what's right for the organization, even if it's uncomfortable.

When facing a challenging situation, there are resources to help guide you. You can contact the Ethics Office or the [Ethics Helpline](#), Human Resources, the Legal Division or a manager in your division.

Remember, the earlier you raise questions or concerns, the sooner we can resolve them before any harm is done.

Keep in mind that Freddie Mac has no tolerance for retaliation. This means that no one at the company can penalize you in any way if you raise a concern in good faith.

## **Our Managers and Leaders Play a Key Role**

Every employee has an opportunity and responsibility to contribute positively to our culture. But those who manage people — all people managers, including senior management and executives — have a special responsibility to lead the way.

We expect all people managers to:

- Act as role models
- Champion a culture of integrity
- Recognize and reward behavior that exemplifies our Values and our Code
- Assist in enforcing the Code
- Report any violations or potential violations of the Code in a timely manner

Certain members of leadership, including the CEO, CFO and Principal Accounting Officer/Controller, must also promote full, fair, accurate and understandable disclosures in filings with the Securities and Exchange Commission (SEC) and in other public communications regarding our financial condition. Their ethical actions in this area set the tone for how our company and every individual who works on its behalf are perceived by the outside world.



SECTION 1

## ***At Our Best,*** **we create a safe and respectful work environment.**

At Freddie Mac, we welcome different backgrounds, life experiences and points of view – understanding that our diversity strengthens our ability to innovate and serve our customers. We treat others with respect, value people’s contributions and look for common ground. We are committed to the safety and security of our employees.

### **Respect and Diversity**

- Treat people fairly – with respect and dignity.
- Act professionally in all interactions – including conversations, meetings, email communications and online exchanges.
- Create an inclusive, equal opportunity work environment that values the opinions of others.
- Engage others positively, without belittling or bullying behaviors.
- Support officers, directors and managers in their efforts to foster a positive work environment.

### **Bringing Our Values Home**

At Our Best, we recognize the value of partnership and take steps to contribute to a positive working environment.

Doing this requires that we listen, compromise and show respect to others – even when we disagree. It means we align ourselves and our teams with what’s right for the company – not just what’s right for us.

### ***At Our Core... We Seek and Embrace Change***

*Innovation and improvement are often made possible by new ways of thinking – including a willingness to challenge “how things have always been done.” We believe that hiring employees with diverse backgrounds and opinions introduces new points of view and makes us better equipped to achieve our business goals.*

## Discrimination and Harassment

- Never discriminate based on race, color, religion, ethnicity, gender, pregnancy, age, national origin, disability, sexual orientation, gender identity/expression, marital status, veteran status, genetic information or any other status protected by applicable law.
- Base employment decisions on the individual's qualifications, skills and performance – not on personal characteristics or protected status.
- Avoid sexually explicit discussions, jokes, and material while at work or using company resources.
- Be careful not to harass others, even without intending to – joking, teasing and commenting about sensitive subjects can offend others and create uncomfortable working conditions.
- Speak up if you witness or experience harassing, discriminatory or unfair behavior.

## Workplace Safety

- Ensure your actions are not intimidating or threatening – and speak up about such behavior by others.
- Do not come to work or conduct any Freddie Mac business when under the influence of alcohol or illegal drugs, or when impaired by prescription medications.
- Do not purchase, sell, manufacture or distribute illegal drugs or related material in the workplace or using Freddie Mac resources.
- Never carry or use weapons, even if licensed, on Freddie Mac premises.
- Use good judgment when alcohol is served at business-related functions.



## Bringing Our Values Home

We're hiring for a new position on my team. I recommended someone I had worked with before, but my manager's response made me uncomfortable when she said the woman I suggested was "probably really busy with her kids" and might not fit into our team environment. After thinking about it for a while, I had a follow-up conversation where I shared that I thought she was being unfair by judging a candidate based on her family situation rather than her abilities, and I hoped she would reconsider. It was a tough conversation to have, but I know I did the right thing. I also know that if I was uncomfortable speaking with my manager, I know I could have called [HR Connect](#) or the [Ethics Helpline](#).

## At Our Core... Partnership

*When we say we prohibit harassment, we don't mean just sexual harassment – we mean that you should avoid taking any actions that a colleague might find offensive for any legitimate reason. If someone says your behavior is offending him or her, take it seriously! If you're not sure whether a behavior or conversation topic is appropriate, ask your manager or talk to the [Ethics Office](#).*



## SECTION 2

# *At Our Best,* we safeguard our company's and our partners' information and resources.



At Freddie Mac, we are good stewards of our assets and those of third parties. We protect company assets from theft, loss and misuse, and protect confidential information of our company, our employees, our business partners and our borrowers and customers. We keep accurate and reliable records, and avoid even the appearance of fraud or misconduct.

### **Use of Company Assets**

- Treat company assets with care – including financial assets, intellectual property, data and information, and buildings and facilities – and use them only for business-related purposes.
- Leave conference rooms and public spaces the way you'd like to find them.
- All expenses must be reasonable and prudent and further a legitimate business purpose.
- Follow all Information Technology safeguards when using company systems.
- Managers must ensure that their people have appropriate access to systems and employees must notify their manager of any inappropriate access they have received.
- Never store company information on personal computers or devices.
- Reasonable and infrequent personal use of company technology assets is permissible, subject to compliance with company policies.

## Confidential Information

- Recognize confidential information and follow all applicable standards and procedures to keep it safe.
- Access confidential information only when authorized, and share it only with those who are authorized to receive it, using confidentiality agreements as appropriate when disclosing to third parties (this sharing rule does not prohibit employees from reporting wrongdoing to a government agency).
- The obligation to protect confidential information continues after your employment with Freddie Mac ends.

## Intellectual Property

- Our brand, trademarks, patents and proprietary information about our business are among our most valuable assets – protect them from unauthorized use or disclosure, and never use them for personal gain.
- Inventions and ideas you develop that are related to our business or created in the course of your employment belong to Freddie Mac.
- Protect all intellectual property in your care, including intellectual property of our business partners.
- If you are aware of a possible misuse or unauthorized disclosure of any intellectual property, speak up.

## Records Management

- Write clearly, professionally and accurately in all documents (e.g., emails, texts, memos, reports and financial statements).
- Take responsibility for the integrity of records you create and manage, and maintain them in compliance with document lifecycle and retention schedules.
- Do not destroy or alter any records that are covered by a “legal hold” initiated by the Legal Division.

## Information Security

- Report incidents such as loss, unauthorized disclosure or theft of confidential information including Protected Personal Information (PPI), or loss or theft of Freddie Mac assets (e.g., laptops) to:
  - Privacy Office: [privacy\\_mailbox@freddiemac.com](mailto:privacy_mailbox@freddiemac.com)
  - Information Security Office: [information\\_security@freddiemac.com](mailto:information_security@freddiemac.com)
  - Legal Division: a member of the [General Corporate Department](#)



## Bringing Our Values Home

I recently entered a conference room and found a folder that had been left behind. When I opened it to see who it belonged to, it was obvious the folder contained confidential information related to our strategy. Although I was tempted to look further, I closed the folder as soon as I understood the confidential nature of its contents. I knew this information was sensitive and couldn't identify the folder's owner – so I delivered it to the [Ethics Office](#).

## At Our Core... Customer Focus

*Our borrowers and customers trust us with some of their most important information. Protecting this sensitive information is one of our most important responsibilities, so we must be sure to take all appropriate steps when accessing or using confidential information.*



SECTION 3

## *At Our Best,* we put the company's interests before our own and disclose conflicts of interest.

To uphold our reputation as a trusted business partner, we must avoid **conflicts of interest**, and disclose any situation that could create even the appearance of a conflict. This means we are careful and transparent when hiring, offer and accept only appropriate business courtesies, and avoid outside activities that may conflict with our obligations to Freddie Mac.

### **Business Courtesies**

- Business courtesies – gifts, entertainment, or hospitality – should never prevent you from making fair and impartial business decisions.
- When offering business courtesies, make sure they are modest in value and given infrequently, without any expectation of reciprocity.
- Never offer or accept cash or cash equivalents.
- Do not offer or accept anything that could reflect poorly on the company.
- Strict rules govern courtesies to government officials – contact the Ethics Office before giving anything of value to a government official.

### **Bringing Our Values Home**

After completing work on a large project, the vendor mailed me four tickets to a concert she knew I would enjoy with a thank you note that said, "Enjoy with your spouse and kids." Although I wanted to go, I knew there were restrictions on the types of gifts we can accept. I reviewed our Business Courtesies policy and was reminded that we can only accept entertainment if the vendor also attends and there is a business purpose. I called my contact and graciously let her know that, as much as I appreciated her gesture, I had to decline the offer and return the tickets. I then notified the Ethics Office to let them know I received an unacceptable business courtesy.

## Other Conflicts of Interest

- **Disclose** any personal relationships that could pose a conflict at work, including:
  - Family members or romantic partners who share the same first or second-level supervisor
  - Being in a position to hire, fire, promote or help advance family members, romantic partners or close friends
  - If a family member or romantic partner is offered a job at Freddie Mac, or has or takes a job with one of our vendors or business partners
- Avoid outside activities, such as second jobs or board memberships, that might divide your loyalties or interfere with your obligations to Freddie Mac.
- Avoid holding investments that create a conflict of interest between you and Freddie Mac.
- Freddie Mac business opportunities should benefit Freddie Mac – Don't take personal advantage of corporate opportunities and don't try to persuade Freddie Mac to do business with a company because it might benefit you or a family member, romantic partner or close friend.
- Don't provide loans to your management, executive officers or members of the Board of Directors.



## At Our Core... Growth and Development

*Getting involved in creative, charitable, political or entrepreneurial activities outside of Freddie Mac can provide personal growth and even increase the skills and experience you bring to your role here. But be aware that you may need to guard against conflicts of interest.*

*The goal of Freddie Mac is not to prevent employees from enrichment or professional development opportunities but rather to ensure that those opportunities do not conflict with the company's interests. **Disclosing** a conflict of interest does not always mean you will be prevented from doing something. Rather, it may be possible to work together with the company to find an acceptable solution.*



SECTION 4

## ***At Our Best,*** we communicate truthfully and responsibly.



Truthful and responsible reporting is critical to the integrity of the markets in which we do business and to Freddie Mac's reputation. We communicate responsibly — whether we are working with regulators and government agencies, auditors, the media, the investment community or anyone else outside our company's walls. And we ensure that our disclosures are truthful and clear.

### **Responsible Communication**

#### ***Working with Regulators, Government Agencies and Auditors***

- Respond to requests for data and information in an accurate and timely manner.
- Be professional and respectful, and escalate issues for resolution when appropriate.
- Keep the Compliance-Regulatory Affairs Office informed of requests from FHFA-Examinations and FHFA-OIG.
- Never obstruct an audit or conceal or misrepresent relevant information.

#### ***Interacting with the media, the investment community and others outside Freddie Mac***

- Only authorized employees may represent Freddie Mac to the public, the media, state officials and Congress.
- All external business-related speaking and publication opportunities must be pre-cleared by Corporate Communications & Marketing.
- Direct any requests for information from the investment community to Investor Relations, from the media to Corporate Communications & Marketing, or from Congress, government agencies, trade or industry groups to Government & Industry Relations.

### Social Media

- Your online conduct outside of work may reflect on the company, so take care when posting.
- Ensure your comments on social media are attributed to you personally, and not to you as a representative of Freddie Mac.
- Never share confidential information about Freddie Mac on social media.
- Obtain authorization from Corporate Communications & Marketing before using social media for business purposes and before posting on Freddie Mac's behalf.

### Truthful Reporting

- Be complete and accurate when reporting assets, liabilities, revenues and expenses.
- Never intentionally falsify a financial record or misrepresent the facts of a transaction.
- Use good judgment when creating or approving expense reports.



### *At Our Core... Drive for Execution*

*Execution means that we focus on the real results, rather than the appearance of results. In other words, we want to be good – not just look good.*

*If your job requires you to rely on information from others, take responsibility to verify the accuracy and completeness of the information you have been given, to make sure you are not unwittingly promoting misrepresentations or misleading information.*



SECTION 5

## *At Our Best,* we conduct our business lawfully and in good conscience.



We all benefit from fair competition and fair play. Being an ethical company means doing business transparently and honestly, and seeking competitive advantage only through legal and ethical business practices. We comply with all laws and regulations that apply to Freddie Mac, including laws related to antitrust, fraud, bribery, insider trading and money laundering.

### **Fair Competition**

- Compete lawfully based on the merits of our products and services.
- Do not engage in price fixing, bid rigging, dividing up customers or markets, limiting availability of products or services, or refusing to deal with specific business partners for impermissible reasons.

### **Anti-Fraud**

- Never misstate the truth or conceal information, whether on behalf of the company or for personal gain.
- Understand how to spot fraud, including false expense reports, misappropriation of assets, unauthorized handling or reporting of transactions, forging or altering documents, and improperly changing financial records or financial statements.
- Refer instances of actual or possible [suspicious activity](#) to:
  - External Fraud: Contact the Mortgage Fraud Hotline at (800) 4FRAUD8 (437-2838) or via email to [mortgage\\_fraud\\_reporting@freddiemac.com](mailto:mortgage_fraud_reporting@freddiemac.com)
  - Internal Fraud: Contact the [Compliance and Ethics Helpline](#)

### Anti-Corruption

- Never offer or accept [bribes, kickbacks or illegal payments](#).
- Immediately report any offers of improper payments to the Ethics Office.
- Carefully supervise all third parties who act on Freddie Mac's behalf and verify that they play fair.

### Personal Investment and Insider Trading

- If you have [material, non-public information](#) (MNPI) about a company, do not purchase or sell securities in that company, and do not "tip" anyone else to trade.
- We prohibit the purchase of Freddie Mac securities by employees. If you already own Freddie Mac securities, only sell them after obtaining pre-clearance.
- Follow all Information Wall restrictions on the flow of potential MNPI to your colleagues identified as [Restricted Persons](#) (select trading employees).



### Bringing Our Values Home

I recently overheard a co-worker talking on the phone, sharing his suspicion that a vendor may soon be purchased by a larger firm. I heard him say that the vendor expected its company's stock to rise significantly if the sale went through. My instinct was to mind my own business, but I suspected that my co-worker was sharing inside information that could get him and others in trouble. It was uncomfortable reporting what I'd heard – but I knew it would help my co-worker in the long run. As tough as it was, I sat down with my manager and told her about what happened and she confirmed that I was right to report it.

### At Our Core... Leadership

*Most laws that prohibit bribery and corruption hold us accountable not only for our own actions but also for the actions of anyone we hire to act on our behalf. Not only must we avoid corrupt behavior, we also must be sure that those who work on our behalf follow the ethical standards that we choose to uphold.*



SECTION 6

## *At Our Best,* we are environmentally responsible and give back to our communities.

Freddie Mac is not just a leader in the industry. We are also good stewards of the resources entrusted to us and we make a difference in the communities where we live, work and play.

### **Corporate Activities**

- Support sustainability efforts in the workplace, such as turning off lights, recycling and minimizing printer and paper use.
- Participate in community service initiatives spearheaded by the company.

### **Personal Political and Community Activities**

- Conduct personal political and community activities on your own time, without using company resources, and be clear that you do not represent Freddie Mac.
- If you choose to solicit colleagues to support your [political or charitable causes](#), do so outside of Freddie Mac premises and outside of work hours.
- Disclose to the Ethics Office if you hold or plan to hold any political office or government-related positions.



SECTION 7

## *At Our Best,* we ask for guidance and report concerns.

At Freddie Mac, each of us is accountable for strong individual and team performance. We want real results and not just the appearance of results. All companies — even those with strong cultures and good intentions — may experience episodes of misconduct.

We have resources to help you make sound decisions, and we encourage you to ask questions and seek guidance. If you suspect that something doesn't seem right, we're counting on you to let us know.

### ***How do I ask for guidance or report misconduct?***

Contact one of these resources:

- Your manager or another manager in your division
- The Ethics Office
- The Compliance & Ethics Helpline
  - Phone: (877) 301-CODE (2633)
  - Internet: [www.FreddieMacEthicsHelpline.com](http://www.FreddieMacEthicsHelpline.com)
- HR Connect or Employee Relations
- The Chair of the Audit Committee of the Board of Directors



### ***How does the Helpline work?***

You can seek advice or report wrongdoing confidentially or anonymously by contacting the Helpline 24 hours a day, 365 days a year.

When you call the Helpline, a third-party service center operator will answer the call. This helps your call to remain anonymous if you so choose. Freddie Mac endeavors to keep your information confidential as consistent with the law and good business practices.

### ***If I report misconduct, what happens next?***

All reports are taken seriously. We will investigate and review the facts promptly and fairly, using an established and objective process.

If we determine that misconduct occurred, we will take appropriate action – up to and including discipline or termination of employment for the individuals responsible.

You may be asked to provide information as part of the investigation. As Freddie Mac employees, it is our duty to cooperate fully, and to be truthful and forthcoming.

It is against our Values and the Code to act in bad faith or to intentionally make a false complaint or statement as part of an investigation.

If you make a report, you may not always know how a situation is resolved or what action the company has taken. But by bringing the matter to our attention, you will have taken an important step in preserving our company's values and ethical culture.

### **No Tolerance for Retaliation**

Freddie Mac is committed to maintaining a work environment where employees can ask questions, voice concerns, and make appropriate suggestions without fear of retaliation.

Freddie Mac will not tolerate retaliation against any company or individual who, based on his or her reasonable good faith belief, reports a concern about potential illegal or unethical conduct or a violation of Freddie Mac policies or assists in the resolution of an investigation or proceeding.

### **Additional Resources**

- Mortgage Concerns: Contact Freddie Mac's Customer Support Department at (800) FREDDIE (373-3343).
- REO Property Questions: Contact HomeSteps' Customer Support Department at (800) 972-7555.



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*This Code of Conduct, Freddie Mac Corporate Policy #1-140, has been approved by the Audit Committee of the Freddie Mac Board of Directors. It has an effective date of January 1, 2017. It contains information pertaining to certain Freddie Mac policies and practices. Every Freddie Mac employee is expected to read this Code carefully as it describes the standards of conduct that govern our business dealings. If you have any questions or concerns about this Code of Conduct, please consult your manager or the Compliance Division.*

*This Code does not alter the at-will employment relationship between Freddie Mac and any employee. Nothing contained in this Code of Conduct constitutes a contract or creates any contractual obligations on the part of the company; nor does anything in this Code expand or increase any employee or third party's legal rights or the company's legal obligations.*

*Freddie Mac may elect to amend this Code at any time. A current version of the Code can be found on Freddie Mac's internal and external websites.*

*Matters relating to the interpretation of this Code and your agreement to this Code, or to the interpretation of any other corporate policy, will be governed by the laws of the Commonwealth of Virginia, without regard to its conflict of law provisions.*

*This Code is the property of Freddie Mac and all rights are reserved.*