

Freddie Mac Contracted Professionals – Policy Compliance
And Code of Conduct Certification

INSTRUCTIONS: After reviewing the Freddie Mac Code of Conduct, you must review, complete and sign this document and return it to a representative of Freddie Mac's Contingent Worker Operations Unit.

Code of Conduct Training for Contracted Professionals

Your employer has assigned you to work on a project for the Federal Home Loan Mortgage Corporation ("Freddie Mac"). At Freddie Mac, we pride ourselves on a workplace characterized by integrity and respect in our actions and personal relationships. Freddie Mac's Code of Conduct ("Code") describes the standards of business conduct that govern Freddie Mac's business dealings. Even though you are not an employee of Freddie Mac, as a contracted professional assigned by your employer to work on Freddie Mac premises ("Contracted Professional"), you should embrace the spirit of the Code and adhere to its standards. You have therefore been provided a copy of, and will be required to take training on, the Code.

Guidelines and Relevant Policies for Contracted Professionals

As a Contracted Professional holding a Freddie Mac issued security badge, you are likely to receive access to confidential information, both as part of your engagement and incidental to your building access. **As a result of Freddie Mac's position in the financial services industry and its role in implementing Making Home Affordable and other government programs, you could be exposed to information of unusual sensitivity.** You must therefore keep in mind the guidelines and policies delineated below when dealing with such information.¹ Other guidelines or Freddie Mac policies may be applicable to you depending on the specific project to which you are assigned; your Freddie Mac point of contact ("Freddie Mac POC"²) or their designee, or a representative of Freddie Mac's Contingent Worker Operations Unit ("CW Operations"), will bring these to your attention and you must comply with them. Contact at CW Operations at 703-918-8505 or your Freddie Mac POC if you have any questions.

1. **Treat all information you learn or obtain in connection with your engagement at Freddie Mac ("Freddie Mac Information"), including anything you see or hear while onsite and information from third parties, as confidential unless you are certain it is already publicly available.** Carelessness with this information exposes Freddie Mac to potential risk, liability and embarrassment, as well as your employer and you individually. Your obligation to protect such information in your possession (including in your memory) or control continues to apply even after your engagement with Freddie Mac ends.
2. **Use Freddie Mac Information only to the extent necessary to perform your 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 highly confidential or subject to legal or contractual restrictions, including the categories of information listed below. Contact your Freddie Mac POC if you are uncertain whether special non-disclosure or other requirements apply to information to which you have access.

¹ All Freddie Mac corporate policies are posted on Freddie Mac's HomeFront intranet site, accessible via the Policies heading.

² Your Freddie Mac POC is the Freddie Mac employee who is responsible for approving your time sheets.

- “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,³ as addressed in the corporate policy on Privacy of Information (Policy 8-500).
- “Confidential Supervisory Information” that Freddie Mac provides to, prepares for or receives from the Federal Housing Finance Agency (“FHFA”), as addressed in Freddie Mac’s corporate policy on Use and Disclosure of Information including Confidential Information (Policy 8-400).
- “Nonpublic Information” relating to services Freddie Mac and its Making Home Affordable Compliance Division perform under a Financial Agency Agreement with the United States Department of the Treasury, as addressed in the Making Home Affordable Code of Conduct (Policy 1-143).

3. **Respect, protect and safeguard all Freddie Mac property, assets and resources.** This includes not only tangible items such as laptops and other equipment (“Freddie Mac Resources”), but also intellectual property (such as ideas, inventions, trade secrets, copyrighted, patented and trademarked materials, and other Freddie Mac Information) that you may develop or have access to in connection with your services to Freddie Mac.

- Use Freddie Mac Resources only for Freddie Mac business-related purposes, provided, however, that incidental personal use of Freddie Mac Resources is permitted for personal matters that cannot conveniently be dealt with other than during the course of a workday so long as the use does not interfere with the business use of the resources or with the user’s job performance.
- Use only Freddie Mac Resources (including e-mail accounts) when performing services for Freddie Mac and do not transmit Freddie Mac Information to or store it on any personal system or device.
- Do not copy Freddie Mac Information to portable storage devices, including a computer’s local “C:” drive (hard drive) unless expressly approved by your Freddie Mac POC and then only using a Freddie Mac issued device.
- Do not install any software on any Freddie Mac device without prior written approval from CW Operations.
- Adhere to applicable Freddie Mac “clean desk” and other security procedures (*e.g.*, secure your computer with a cable and lock the screen before leaving your desk, retrieve documents from printer and copiers immediately, *etc.*).
- Your employer’s contract with Freddie Mac includes provisions regarding the ownership of materials you receive or develop while working for Freddie Mac. Generally, Freddie Mac owns all such materials. You must assist Freddie Mac in protecting its rights in such materials, both while you are providing services to Freddie Mac and thereafter, and you may not take copies of these materials or any Freddie Mac Information with you when your engagement ends.

Freddie Mac may monitor, access, delete and disclose all use of the Freddie Mac Resources (including e-mail, web sites visited, material downloaded or uploaded and the amount of time spent on-line), at any time without notification or your consent and you should have no expectation of privacy in your use of Freddie Mac Resources.

³ PPI includes, but not limited to, social security number, driver’s license number, date of birth, passport number; financial account number/s, credit or debit card number, mother’s maiden name; signature, biometric data, criminal background checks, any sensitive information contained in a consumer credit report or employment background check, criminal or employment background check information, information, and any other information as determined by Freddie Mac’s Privacy Office.

- 4. Immediately report any actual or suspected information security incident, fraud or violation of law to your Freddie Mac POC or, where applicable, the Freddie Mac stakeholders specified below, and fully cooperate with any investigation into such matters.**
- Report suspected loss, misuse or unauthorized disclosure of confidential Freddie Mac Information to the Freddie Mac Compliance and Ethics Helpline (1-877-301-2633) or the Freddie Mac Information Security Hotline (571-382-3333).
 - Report any actual or suspected instance of financial instrument fraud (including mortgage-related fraud) to Freddie Mac's Financial Fraud Investigation Unit (1-800-437-2832) and all other instances of actual or suspected fraud or violation of laws to the Freddie Mac Compliance and Ethics Helpline (1-877-301-2633).
- 5. Contracted Professionals are not employees of Freddie Mac and nothing in this document or any related training you receive is intended to alter your status as a Contracted Professional.**
- Don't hold yourself out as an employee of Freddie Mac and don't speak about or on behalf of Freddie Mac, whether to the press or as an invited speaker at an event or otherwise, without prior written approval from CW Operations.
 - You are not entitled to receive any compensation or benefits intended for Freddie Mac employees (i.e., benefits under Freddie Mac's stock, stock option, retirement/pension, compensation, health, bonus or vacation/holiday pay programs) and should look solely to your employer for any compensation or benefits to which you believe you are entitled.
 - Because you are not employed by Freddie Mac, Freddie Mac has no obligation to remit to any taxing authority any amounts owed by you, including Social Security tax and any such obligations fall singly or jointly upon you or your employer.
 - Contracted Professionals cannot use services or engage in activities intended for the benefit of Freddie Mac employees, such as use of the Freddie Mac fitness center and participation in Freddie Mac sponsored training, recreational activities, seasonal celebratory events and Freddie Mac awards and recognition ceremonies.