

EEO/Non-Discrimination

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Document Change Control Log

Version Date	Version Number	Nature of Revision	Section/ Page (s) Revised	Revised by Name and Title	Approved by Name and Title
10/10/06	01.00	Final v0100 document	All	Eveline Shum, Director, HR Process & Compliance	Betty Thompson, VP, HR Management & Operations
2/23/09	01.01	Revised and updated language	All	Mike Kessler, Director, Recruiting, HR Management & Operations,HR	Christine Wolf, SVP and Chief Human Resources Officer, HR Management & Operations, HR
3/4/10	01.02	Added "genetic" information of employee	Page 5, Section 9	Mike Kessler, Director, Recruiting, HR Management & Operations,HR	Christine Wolf, SVP and Chief Human Resources Officer, HR Management & Operations, HR
9/22/10	01.03	Reposted correct version		Lynn Carter, Project Analyst, HR Management & Operations,HR	Christine Wolf, SVP and Chief Human Resources Officer, HR Management & Operations
9/27/11	01.04	Updated language on individual responsibilities and added paragraph on Manager/Director/Officer/HRBP responsibilities	Section 5, Page 5	Mike Kessler, Director, Governance, HR Management & Operations,HR	Brian McQuaid, Vice President and Interim Chief Human Resources Officer, Human Resources Management & Operations, HR
10/9/12	01.05	Updated language & verbiage Updated author	All	Karen Jez, VP, HR Business Partners, Human Resources Management & Operations, HR	Brian McQuaid, SVP & Chief Human Resources Officer, Human Resources Management & Operations, HR

10/08/13	01.06	Updated policy owner and approver; Updated format of procedure, added supporting documentation, and updated Delegation language	All; All, Section 1, Section 4	Alan Susi, Non Tech Proj Mgmt Mgr, Human Resources Management & Operations, HR; Tamara Carrera, Project Analyst II, HR Management & Operations, HR	Bill Fahey, VP HR Shared Services, Human Resources Management & Operations, HR
10/08/14	01.07	Updated policy owner, date, version number, added HRSC as poc for notifications and for policy interpretations,	All, Section 6, 7, 8	Tamara Carrera, Project Analyst III, HR Management & Operations, HR	Bill Fahey, VP HR Shared Services, Human Resources Management & Operations, HR
10/08/15	01.08	Updated date, version number	All	Tamara Carrera, HR Associate IV, HR Mgmt & Operations, HR	Bill Fahey, VP HR Shared Services, HR Mgmt & Operations, HR
01/13/16	01.08	Minor edit to footer – removed Confidential Internal Distribution language per Legal	All	Tamara Carrera, HR Associate IV, HR Mgmt & Operations, HR	Cheryl Sember, VP HR Business Delivery, HR Mgmt & Operations, HR

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1. Documentation

Policy Name	EEO/Non-Discrimination
Version Number	01.08
Policy Identifier	HR-0002
Superseded Policy(ies)	01.07
Date Approved	October 08, 2015
Effective Date	October 08, 2015
Policy Author(s)	Karen Jez, VP, HR Business Partners, HR Management & Operations, HR
Policy Owner	Carrie Lee, Director Employee Service, HR Management & Operations, HR
Policy Approver	Bill Fahey, Vice President HR Shared Services, HR Management & Operations, HR
Policy Repository	Corporate Policies and Procedures Repository (CoPPeR)
Supporting Documentation	<ol style="list-style-type: none"> 1. Letter of Instruction (LOI) Policy (CE-0062) 2. FHFA OCO Approval Request Procedure (CE-PR-0066) 3. See Appendix A

2. Statement of Purpose

This document sets forth Fannie Mae's policy regarding equal employment opportunity (EEO) in employment-related decisions.

The primary directives that create a need for this policy are as follows.

- Civil Rights Act of 1866
- Title VII of the Civil Rights Act of 1964, as amended
- Equal Pay Act of 1963, as amended
- Americans with Disabilities Act of 1990, as amended
- Age Discrimination in Employment Act of 1967, as amended,
- State and local fair employment statutes, ordinances, and regulations, as amended (in the jurisdictions where an employee works, including, but not limited to, the District of Columbia Human Rights Act, the Virginia Human Rights Law, the Maryland Fair Employment Practices Act, the California Fair Employment and Housing Act

See Appendix B for a full listing of directives.

3. Applicability and Scope

The EEO/Non-Discrimination policy applies to all current and prospective employees and contractors.

4. Delegations

The roles and responsibilities, requirements, escalations, exceptions and notifications detailed in this policy are subject to the powers reserved by the CEO, Board of Directors and Conservator as outlined in the EDoA, Annex A and Annex B of the EDoA as of the most recent effective date. These reserved authorities will take precedence in circumstances where a conflict or ambiguity of authority within this policy may exist.

In Part V. Section I. of the Executive Delegation of Authority, the CEO delegates to the Chief Human Resources Officer (CHRO-SVP) the authority to manage matters related to Human Resources.

5. Roles and Responsibilities

- *Employees* — Responsible for knowing, understanding, and adhering to this policy, including any supporting policies, practices, and/or procedures.
- *Managers* — Must ensure that every employee they supervise is aware of, understands, and complies with all guidelines as stated in the requirements section below, including all guidelines as documented in the supporting policies, practices, and/or procedures.
- *Human Resources (HR) Division* — Responsible for ensuring the consistent application of this policy for all employees.
- *Policy Owner* — Responsible for resolving any questions or disputes arising from the interpretation of this policy.
- *Policy Approver* — Responsible for approval of this policy.

6. Requirements

Fannie Mae is committed to equal opportunity in employment and a work environment that values workplace diversity and respect for all individuals.

Fannie Mae provides equal employment opportunity for all employees and applicants and prohibits any form of discrimination in employment on any basis protected by applicable federal, state or local law including without regard for genetic information of the employee, race, religion, color, sex, national origin, age, marital/parental status, family responsibilities, gender identity, sexual orientation, disability, or veteran status.

Fannie Mae will provide reasonable accommodation to qualified individuals with disabilities who are employees or applicants for employment, unless to do so would cause undue hardship to the company. In general, an accommodation is any change in the work environment or in the way things are customarily done that enables an individual with a disability to perform his/her job and otherwise enjoy equal employment

opportunities.

In keeping with this EEO/Non-Discrimination policy, the company expects employees to conduct themselves in a manner that demonstrates respect and that exhibits the value the company places on diversity and civility in the workplace.

This policy applies to all terms, conditions, and privileges of employment, including, but not limited to, hiring, transfer, promotion, termination, training, compensation, and benefits.

Individual Responsibilities

Every Fannie Mae employee has the responsibility for knowing and complying with this policy, and for reporting and preventing noncompliance. The report/complaint should be made to FM Ethics and/or Investigations, or to the employee's supervisor/manager, an officer; or to the HR Service Center or an HR Business Partner. If the complaint involves actions or behaviors by any of the foregoing, the employee is not required to report it to such involved person(s), but rather he/she should make the report/complaint to someone not involved in the actions/behaviors giving rise to the report/complaint. Employees always have a viable means to report violations of this policy to anyone in upper management, and will not be retaliated against for reporting violations at any level. Contractors and consultants should refer to the *Service Requirements for Contractors and Consultants* (available on CoPPeR) for additional information.

Employees may also choose to discuss concerns with the HR Service Center (x2222 or 202-752-2222 or 888-474-3578) or employees of Compliance and Ethics. Complaints may also be made via the 1-888-FM-ETHICS phone line or FM Ethics Web line at <https://fmethics.eaweblne.com/> (anonymously, if desired).

Supervisor/Manager/Director/Officer/Human Resources Responsibilities

Fannie Mae expects any supervisor, manager, director, officer, HR Service Center Representative, and HR Business Partner, who is given information indicating that this Policy may have been violated by any person to report such information to FM Ethics, Investigations, or to Human Resources. If you are a supervisor, manager, director, officer, HR Service Center Representative, or HR Business Partner, you must know, communicate, and help to enforce this Policy.

7. Conflict Resolution and Escalations

Specific interpretations of this policy may be obtained by contacting the HR Service Center (x2222 or 202-752-2222 or 888-474-3578).

Any disputes resulting from the interpretation of this policy should be directed to the Policy Owner. If the Policy Owner does not resolve the dispute, the Policy Approver shall resolve the dispute.

8. Policy Exceptions

No exceptions are permitted for this policy.

Specific interpretations of this policy may be obtained by contacting the HR Service Center (x2222 or 202-752-2222 or 888-474-3578).

9. Policy Review

HR will conduct an annual review of this policy yearly. The policy also shall be reviewed pursuant to any changes in related regulations listed in Appendix B to ensure continued compliance with those regulations.

10. Definitions

Abbreviation	Definition
HR	Human Resources
SVP	Senior Vice President
VP	Vice President

11. Additional Policy Elements

Appendix A Supporting Documentation

Related Policies

- Code of Conduct
- Standards of Professional Behavior
- Prevention of Sexual & Other Illegal Harassment
- Disabilities and Reasonable Accommodation
- Reasonable Religious Accommodation
- Employment At-Will

Appendix B Directives for Policy

External and internal directives that create a need for this policy include, but are not limited to, the following laws, regulations, and industry practices.

- Fannie Mae Code of Conduct
- Civil Rights Act of 1866

- Title VII of the Civil Rights Act of 1964, as amended, which prohibits employment discrimination based on race, color, religion, sex, or national origin
- Equal Pay Act of 1963 (EPA), as amended, which protects men and women who perform substantially equal work in the same establishment from sex-based wage discrimination
- Age Discrimination in Employment Act of 1967 (ADEA), as amended, which protects individuals who are 40 years of age or older from age discrimination
- Title I and Title V of the Americans with Disabilities Act of 1990 (ADA), which prohibit employment discrimination against qualified individuals with disabilities
- State and local equal employment opportunity statutes, ordinances, and regulations, as amended (in the jurisdictions where an employee works, including, but not limited to, the District of Columbia Human Rights Act, the Virginia Human Rights Law, the Maryland Fair Employment Practices Act, the California Fair Employment and Housing Act
- Sarbanes-Oxley Compliance