



# **Service Requirements for Contractors and Consultants: THE CONTINGENT WORKER CODE OF CONDUCT**





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# Ethical Decision Making

The Service Requirements for Contractors and Consultants (SRCC) functions as Fannie Mae's Contingent Worker Code of Conduct and requires that you demonstrate ethical behavior in the performance of services for Fannie Mae. In many situations, however, the right course of action is not obvious. This may be due to competing considerations that arise in a specific context, or the complex rules and regulations that govern the way Fannie Mae does business. The SRCC is designed to assist you in making the right decisions in your work for Fannie Mae.

Here are some general questions that you can ask to help you make an ethical decision.

- Is the decision legal?
- Does it comply with my employer/Fannie Mae supplier ("Employer")'s codes, policies, and other requirements?
- Does it comply with the SRCC?
- Does it comply with Fannie Mae Code of Conduct, policies, standards, or procedures?
- Am I leading by example? Am I getting things done right?
- How would it look? Would the decision stand the test of time? Am I being reasonable and honest?

If you answered "no" to any of these questions or are otherwise unsure how to answer, ask for guidance from any of the following until you get guidance that resolves your concern: your Employer, the Fannie Mae Contractor Resource Center ("CRC"), FM Ethics, or your Fannie Mae Point of Contact ("POC").

## Committing to the SRCC

Through the Supplier Personnel Certification, you agree to comply with the SRCC when providing services to Fannie Mae. If your behavior is inconsistent with Fannie Mae's expectations under the SRCC, you may be subject to offboarding from your engagement. If you witness any suspected incidents of inappropriate behavior under the SRCC, you should report them to any of the contacts identified in Section VI, as appropriate.

This document is also a part of the contract between Fannie Mae and suppliers, governing their services for Fannie Mae.

The SRCC has a three-part structure to ensure you understand the Guiding Principles and how to apply them in your performance of services for Fannie Mae.

**Overview:** A summary of the values, expected conduct and ethical concepts embodied in each Guiding Principle of the SRCC.



**Know the SRCC:** Specific guidance and obligations that must be followed in everyday activities to ensure compliance with the SRCC.

**Don't:** Examples of behaviors that violate the SRCC. You must avoid these.

## I. I Provide High-Quality Service

### Overview

Fannie Mae retains contingent workers (contractors and consultants) to provide high-quality service.

### Know the SRCC

- I perform the services that are required of me, and I stay on task, on time, and within budget.
- I supply accurate information regarding my credentials and experience in order to secure and perform my role with Fannie Mae.

### Don't

- Work on projects not assigned to you or not covered by the Statement of Work or Job Description as outlined in the Requisition (your Employer will have details of the Job Description).
- Falsify credentials or participate in fraudulent or misleading application, interviewing, or onboarding practices in order to secure your role or assist others in doing so.

## II. I Value and Respect Others

### Overview

Fannie Mae recognizes and values every individual's unique skills and perspectives, a respect we extend to all our business relationships – with employees, shareholders, contingent workers, suppliers, and business partners. We expect all our employees, contingent workers, suppliers, and business partners to treat each other with dignity and respect, and support Fannie Mae's efforts to foster a workplace free of discrimination, harassment, and retaliation.

### Know the SRCC

- Fannie Mae prohibits any form of discrimination, harassment, or retaliation in the workplace or in any aspect of contracting.

### Don't

- Swear at, use offensive language toward, or threaten another person in the workplace.
- Request sexual favors or repeatedly ask another person out; use sexual innuendos; or make unwanted or offensive sexual advances toward, or physical contact with, another individual in the workplace or at a work-related event.



- Make derogatory comments, use negative stereotypes, or post or email or otherwise share jokes, stories, or images based on sex, race, national origin, caste, or other characteristics identified in Fannie Mae's policies, standards, or procedures.

## III. I Protect Fannie Mae's Corporate Assets

### Overview

It is important to be a careful steward of Fannie Mae's corporate assets. This means that contingent workers safeguard both Fannie Mae's physical assets and its intangible assets, such as its Confidential Information, intellectual property, data, name, and reputation.

### Know the SRCC

- You must follow any policies or other requirements that apply to the services you perform for Fannie Mae that relate to the protection of Fannie Mae's Confidential Information, Nonpublic Personal Information ("NPI") and assets. You must review all instructions and documentation provided to you by Fannie Mae or your Employer related to Fannie Mae's business and assets.
- You must protect Fannie Mae's tangible assets from all physical harm and theft.
- You must protect Fannie Mae's intangible assets – even after concluding your services for Fannie Mae. These assets include Confidential Information, namely information that is not generally known to the public about Fannie Mae's products, services, business partners, investors, business, or other activities. Intangible assets also include Fannie Mae's intellectual property rights, such as copyright, trademark, and patent rights.
- Respect the intellectual property rights of others, including those of Fannie Mae's competitors, suppliers, and business partners.
- Protect the confidentiality, security, and integrity of the personal information of others, such as personal information about Fannie Mae employees, contractors, consultants, and individual borrowers.
- You agree to assign to Fannie Mae any intellectual property rights in any work products and innovations that relate to Fannie Mae's business that are made or conceived by you, either alone or with others, during the performance of your services for Fannie Mae.

I understand that:

- I am given access to Fannie Mae's tangible and intangible assets only for use in conducting Fannie Mae business.
- I use my Fannie Mae billed time, equipment, technology resources, and supplies for Fannie Mae's work only and not for outside activities.
- I have no right or expectation of privacy when using Fannie Mae's assets and Fannie Mae reserves the right to monitor my use, make use of any impropriety found, and disclose any wrongdoing that



it uncovers.

## Don't

- Distribute any Fannie Mae Confidential Information – such as information posted on HomeSite for Contractors/Employees (as applicable) or sent via Fannie Mae email/Teams or other secure or authorized method – to an unauthorized third party, system or server, or to your own personal email system or server or to your Employer's email system for unauthorized purposes.
- Make unauthorized disclosures of Nonpublic Personal Information (“NPI”) of Fannie Mae, its business partners, or employees.
- Email unencrypted NPI to external parties (including personal email systems).
- Use access credentials without proper authorizations.
- Represent yourself as a Fannie Mae employee; communicate with the media on behalf of Fannie Mae; commit to an advertisement on behalf of Fannie Mae; or use Fannie Mae's name, logo, influence, data, or other assets in connection with any outside personal or business activity.
- Use any Fannie Mae resources for personal gain or other activities, such as outside employment.

## IV. I Avoid Conflicts of Interest and Bribery

### Overview

Contingent workers must avoid any conflict, any potential conflict, or the appearance of a conflict between Fannie Mae's business interests and their own personal interests, activities, and relationships, and must avoid exposing the company to reputational risk.

### Know the SRCC

- I understand that if I can make or influence a decision regarding Fannie Mae's business concerning an entity (“Entity”), I must disclose to Fannie Mae the following:
  - owning a financial interest in the Entity that does business with, seeks to do business with, or competes with Fannie Mae;
  - serving on a board of directors or advisory body of an Entity that does business with, seeks to do business with, or competes with Fannie Mae; or
  - engaging in employment with the Entity if I know it does business, seeks to do business, or competes with Fannie Mae.
- I may not engage in employment with an entity that would result in the disclosure or use of confidential or proprietary Fannie Mae information or trade secrets.
- I understand that, because the risk of a conflict is especially acute, any transaction, including the purchase, acquisition, or rental in Fannie Mae Real Estate-Owned (“REO”) Property or short sale transactions related to any property that secures a Fannie Mae-owned loan by me or my immediate



family members (financial dependents and household members) is prohibited.

### Don't

- Engage in any transactions of Fannie Mae REO properties or short sale transactions that secure a Fannie Mae loan.
- Conduct work for another entity where you could reasonably disclose or use Fannie Mae Confidential Information.
- Fail to disclose any financial interest, activity, or other employment for which you have the ability at Fannie Mae to make, recommend, or influence business decisions concerning that interest, activity, or other employment.
- Offer, promise, pay, or give anything of value – directly or indirectly – either to a government employee or official, or to a foreign official, foreign political party, party official, candidate, or their staff in a manner inconsistent with applicable law or policy in connection to your work for Fannie Mae.
- Offer, give, solicit, or accept any inappropriate gifts, entertainment, bribes, inducements, or kickbacks in connection to your work for Fannie Mae.

## V. I Support a Productive and Safe Workplace

### Overview

Fannie Mae has established certain corporate standards, practices, policies, and procedures to support its efforts to foster a safe work environment and operations. Fannie Mae has designed and maintained facilities to protect its employees, contingent workers, visitors, and physical resources, and Fannie Mae maintains a workplace that is free from the effects of drug and alcohol abuse.

### Know the SRCC

- I foster an environment that is free from harassment, intimidation, physical altercation, bullying and destruction of property.
- I take appropriate steps to prevent accidents from occurring, observe safety regulations, and eliminate hazards likely to cause accidents, no matter the location in which I work.
- I do not provide services under the influence of alcohol or drugs not taken in accordance with the recommended dosage instructions, or the prescribed directions of my healthcare professional.

### Don't

- Ignore an unsafe work condition.
- Perform services for Fannie Mae while under the influence of alcohol or while engaged in substance abuse, including illegal substances or controlled substances not taken in accordance with the dosage prescribed for individual use.



- Use any smoking products on Fannie Mae campuses.
- Possess any kind of weapon in Fannie Mae workspaces, unless such possession is supported by the express written consent of Fannie Mae.
- Possess any kind of weapon while on other Fannie Mae premises (such as parking lots), unless such possession is supported by the express written consent of Fannie Mae or otherwise permitted by federal, state, or local law.
- Engage in conduct that is commonly considered to be threatening or could incite, provoke, or lead to violence.

## VI. I Raise Compliance and Ethics Concerns

### Overview

At Fannie Mae, contingent workers are expected to promptly raise compliance and ethics questions and concerns that come to their attention. Fannie Mae does not tolerate retaliation against any individual or company who raises a compliance and ethics concern in good faith or participates in an investigation, and contingent workers comply with these obligations.

### Know the SRCC

- If I have a question about compliance and ethics, am unsure about my obligations or those of others, or suspect or know that wrongdoing has occurred or will occur, I raise my question or concern with:
  - My Employer;
  - The CRC by phone at (202) 752-1234, option #5, or by email at [contractor\\_resource\\_center@fanniemae.com](mailto:contractor_resource_center@fanniemae.com); and/or
  - Fannie Mae Ethics by:
    - Phone at 1-888-FM-ETHICS (1-888-363-8442)
    - Email at [fm\\_ethics@fanniemae.com](mailto:fm_ethics@fanniemae.com), or
    - FM Ethics Webline at [www.fanniemae.com/fmethics](http://www.fanniemae.com/fmethics).
- I understand that I may contact FM Ethics confidentially or anonymously. I also understand that compliance and ethics concerns must be raised in good faith.

### Don't

- Fail to raise a suspected or known violation of policy, law, or regulation in an appropriate manner.
- Retaliate against anyone because of a question that they ask, a report that they make or their involvement in an investigation.
- Fail to cooperate with or otherwise interfere with a Fannie Mae investigation.





- Knowingly and falsely accuse a Fannie Mae employee or another contingent worker of wrongdoing.

## VII. I Am Honest and Trustworthy

### Overview

Fannie Mae contingent workers are required to treat one another, our shareholders, customers, suppliers, and regulators respectfully and in a straightforward manner. In addition, Fannie Mae is committed to exemplary financial and regulatory reporting. Contingent workers play a role in protecting the integrity of Fannie Mae's transactions and must ensure that all corporate records within their scope are accurate and complete. Contingent workers also support the company's commitment to make disclosures to the public through appropriate public communications that contain full, fair, accurate, timely, and understandable information.

### Know the SRCC

- I am committed to reflecting all transactions within my scope properly, accurately, and promptly in all financial statements, books, or records. This includes compliance with applicable accounting rules, principles, and standards.
- If my services include complying with internal accounting, operational, and disclosure controls and procedures, I make sure that I know and follow them.
- I make sure that I am familiar with any professional ethics, regulatory requirements, my Employer's corporate procedures, and any Statements of Work or Job Description/Requisition details that affect or govern my services or those of the business unit to which I am assigned, including approved work locations.
- If my services include preparing Fannie Mae's external communications or disclosures or providing information as part of that process, I prepare such communications in compliance with Fannie Mae's policies, standards, and procedures.
- I retain records in accordance with Fannie Mae's policies, and applicable legal and regulatory requirements.
- I am truthful and transparent when I use social media internally and externally in a way that could reflect on Fannie Mae. I never post in ways that could be interpreted as speaking on behalf of Fannie Mae unless specifically authorized by Fannie Mae's Chief Marketing Officer.
- I am truthful and transparent in all dealings directly or indirectly related to the services I provide.
- I accurately record the hours that I perform services for Fannie Mae.

### Don't

- Take unfair advantage of others through manipulation, concealment, abuse of privilege or confidential information, or misrepresentation.
- Make false, misleading, or inaccurate statements or entries in Fannie Mae's financial statements,



time-reporting tools, books, or business records (e.g., emails, business plans, project plans, and results), including failing to record or disclose an asset or liability or inaccurately reporting performance time or data, in order to deceive others.

- Make false or misleading statements about Fannie Mae to a regulator, auditor, or other government official or agency.
- Create false or misleading trading records.
- Inaccurately report information related to a Statement of Work or Job Description (i.e., associated deliverables and milestone, reporting hours worked on projects).
- Falsify and/or report inaccurate hours on time sheets, bills, or invoices.
- Falsify expense reports or any supporting documentation such as receipts.
- Use social media internally or externally in a way that relates to or that could reflect on Fannie Mae in a disrespectful, derogatory, hateful, bigoted, defamatory, threatening, offensive, or obscene manner.

## VIII. I Obey the Law

### Overview

Fannie Mae expects those who provide services to obey the letter and spirit of all laws and applicable regulations. Your conduct and your interactions with Fannie Mae employees, other contractors or consultants, and the government must be in accordance with the highest ethical standards.

### Know the SRCC

- I immediately inform my Employer, Fannie Mae's CRC, and/or FM Ethics if I am contacted by a government investigator, agency, or official about a government inquiry or proceeding regarding Fannie Mae.
- I trade securities in compliance with Fannie Mae's insider trading policies.

### Don't

- Make false or misleading statements to any government agencies or officials, including the Federal Housing Finance Agency, Department of Housing and Urban Development, Securities and Exchange Commission, or the Department of the Treasury.
- Make false or misleading statements about Fannie Mae, or its contingent workers, competitors, suppliers, business partners, or employees.
- Trade securities of Fannie Mae or any other company when you have material, nonpublic information about the company or the securities.
- Share material, nonpublic information about Fannie Mae or other companies without a legitimate



business purpose or with anyone who is not authorized to receive it.

## SRCC Key Definitions

### Conflicts of Interest

- **Actual Conflict of Interest:** Where a contingent worker has a personal interest, activity or relationship and has the ability to make, recommend or influence Fannie Mae business decisions that might impact that interest, activity or relationship or the interest, activity or relationship may materially interfere with their ability to perform services for Fannie Mae
- **Potential Conflict of Interest:** Where there is a substantial risk of an Actual Conflict of Interest occurring
- **Appearance of a Conflict of Interest:** Where a reasonable person with knowledge of the relevant facts would come to the conclusion that a Conflict of Interest is presented
- **Reputational Risk:** Where a contingent worker's interest, activity or relationship is inconsistent with Fannie Mae's best interests, its policies or applicable law, or disrupts or impairs Fannie Mae's relationship with any person or entity with which Fannie Mae has or may have a business relationship

### Nonpublic Personal Information (NPI)

Information that is personally identifiable and not publicly available, including Social Security numbers, Driver's License numbers, financial account numbers, credit card numbers and passport numbers.

### Confidential Information

Information, data, or technology relating to Fannie Mae's products, services, business, personnel, or commercial activities that is not generally known to the public and:

- Derives actual or potential economic value from not being generally known; or
- Is of such character that Fannie Mae has a legitimate interest in maintaining its secrecy; or
- The unauthorized disclosure of which could be detrimental to the interests of Fannie Mae; or
- The unauthorized disclosure of which violates federal or state legal and regulatory requirements.

### Material Nonpublic Information

Information is "material, nonpublic information" if: (a) either (1) there is a substantial likelihood that a reasonable investor would consider it important in deciding whether to buy, sell, or hold a security; or (2) a reasonable investor would view the information as significantly altering the total mix of information available, and (b) the information has not been broadly disseminated to the investing public. See the Insider Trading Policy for additional guidance and discussion of what may constitute material, nonpublic information.