

Service Requirements for Contractors and Consultants





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Ethical Decision Making

The SRCC 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 at Fannie Mae.

Here are some general questions that you can ask yourself to help you make good ethical decisions.

- Do I have any concerns about the legality of the action?
- Does it comply with my employer's (Fannie Mae supplier's) codes, policies, and other requirements?
- Does it comply with the SRCC?
- Does it comply with Fannie Mae policies, standards, or procedures?
- Is it likely the assignment, task, or instruction, given to me by any Fannie Mae employee or other agent, will be viewed favorably if it became public, was revealed to the media, or to Fannie Mae's regulator?
- And finally, 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 and keep asking until you get guidance that resolves your concern(s): your employer/Fannie Mae supplier, 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, Contingent Workers agree to comply with the SRCC when providing services to Fannie Mae. The SRCC has a three-part structure to make sure 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 every-day 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 know how to perform the services that are required of me, and I stay on task, on time, and within budget.

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 supplier will have details of the job description).

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. If your behavior is inconsistent with Fannie Mae's expectations, you may be subject to offboarding from your engagement. If you witness any suspected incidents of inappropriate behavior, you should report them to any of the following: your employer/Fannie Mae supplier, the Fannie Mae Contractor Resource Center ("CRC"), FM Ethics, or your Fannie Mae Point of Contact ("POC"), as appropriate. If the issue involves actions or behaviors by any of the above, you are not required to report it to such involved person(s), but rather someone not involved in the behaviors giving rise to the report/complaint.

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 and others safeguard both Fannie Mae's physical assets and its intangible assets, such as its confidential information, intellectual property, data, name, and reputation, and also respect the property and privacy of others.

Know the SRCC:

- It is your responsibility to become familiar with and follow any standards, practices, procedures, policies, or other requirements, that may apply to the services you perform for Fannie Mae, particularly as they relate to the protection of Fannie Mae's people and assets. You understand that this requires you to review any instructions and/or documentation provided to you by Fannie Mae or your employer, related to Fannie Mae's business and assets.
- You will protect Fannie Mae's tangible assets from all physical harm.
- Protect Fannie Mae's intangible assets – even after performing services for Fannie Mae. These assets include confidential information that is not generally known to the public about Fannie Mae's products, services, business partners, investors, business, or other activities. This also includes 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, 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.
- Assign to Fannie Mae, any intellectual property rights that you may have 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.
- Adhere to any and all agreements that relate to you or the services you provide to Fannie Mae, including without limitation any non-disclosure agreements or commitments to safeguard Fannie Mae confidential, proprietary, or non-public personal information, or other agreements between you and your employer/Fannie Mae supplier.

I understand that:

- Fannie Mae's physical and intangible assets are provided to me and I am given access to them only for conducting Fannie Mae business. I use my Fannie Mae time and the equipment and supplies given to me for Fannie Mae's work only.



- As a contractor or consultant, I am prohibited from using Fannie Mae’s technology resources (such as telephones, computers, email, and Internet access) for any personal reason.
- I have no right to privacy when using Fannie Mae’s assets and that 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 or other secure method – to an unauthorized third party, system, or to your own personal home or supplier firm’s email system for unauthorized purposes.
- Make unauthorized disclosures of Nonpublic Personal Information (“NPI”) of Fannie Mae, or 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 of Fannie Mae’s resources for personal gain or other activities, such as outside employment.

IV. I Avoid Conflicts of Interest

Overview

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

Know the SRCC:

- I understand that there may be interests, activities, and relationships that I am obligated to disclose to Fannie Mae for review and for which restrictions may arise, such as:
 - owning a financial interest in a company that does business with, seeks to do business with, or competes with Fannie Mae, especially if I am in a position to make, control, or influence a decision with respect to Fannie Mae’s business with that company;
 - serving on certain boards of directors or advisory bodies of entities, especially if I am in a position to make, control, or influence a decision with respect to Fannie Mae’s business concerning the entity;
 - engaging in employment with any entity that does business, seeks to do business, or competes with Fannie Mae; or



- the employment of my relatives by Fannie Mae or any entity that does business, seeks to do business, or competes with Fannie Mae.
- 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 relatives is prohibited.

Don't:

- Use your relationship with Fannie Mae or Fannie Mae's property, information, or funds for your personal benefit or the benefit of a relative, friend, or associate.
- Fail to identify any significant personal relationships, including with relatives, friends, or associates, that create – or could give the appearance of or the potential for – a conflict of interest with your obligations to Fannie Mae.
- 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.
- Offer, give, solicit, or accept any inappropriate gifts, entertainment, bribes, inducements, or kickbacks.

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. Fannie Mae strives to protect its environment by working to maximize the efficiency of the energy and resources it uses.

Know the SRCC:

- I foster an environment that is free from harassment, intimidation, physical altercation, bullying or 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, included 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, you are expected to promptly raise compliance and ethics questions and concerns that come to your 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 we 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 (Fannie Mae supplier);
 - The CRC by phone at (202) 752-1234, option #5, or by email at contractor_resource_center@fanniemae.com
 - Compliance and Ethics via FM Ethics by:
 - Phone at 1-888-FM-ETHICS (1-888-363-8442)
 - Email at fm_ethics@fanniemae.com, or
 - FM Ethics Webline at 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 he or she asks or a report that he or she makes.
- Fail to cooperate with or interfere with an investigation.



- Knowingly and falsely accuse a Fannie Mae employee or another contractor or consultant of wrongdoing.

VII. I Am Honest and Trustworthy

Overview

Fannie Mae is committed to exemplary financial and regulatory reporting. Contingent workers protect Fannie Mae's transactions and ensure that all corporate records 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 disclosure.

Know the SRCC:

- If my services include preparing transactions, I am committed to reflecting those transactions 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/supplier'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.
- 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 that could reflect on Fannie Mae. If my content is professionally focused, 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.
- Destroy documents improperly or discard records prior to the expiration of the applicable retention period.
- I accurately record the hours that I perform services for Fannie Mae.
- I protect the confidential information of Fannie Mae and its partners when I communicate externally. If I have a question as to whether information is confidential, I ask.

Don't:

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



time-reporting tools, books, or records, 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.
- Create false or misleading trading records.
- Inaccurately report information related to 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.
- Make false statements in business records, e.g., emails, business plans, project plans, and results.
- Use social media internally or externally relating to or that could reflect on Fannie Mae in a disrespectful manner or use hateful, bigoted, defamatory, threatening, offensive, or obscene language in way that violates the SRCC.

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, or the government must be in accordance with the highest ethical standards.

Know the SRCC:

- I immediately inform my employer/supplier, Fannie Mae's CRC, and/or Fannie Mae Compliance and Ethics if I am contacted by a government investigator or official about a government inquiry or proceeding regarding Fannie Mae.



Don't:

- Make false or misleading statements to the Federal Housing Finance Agency, Department of Housing and Urban Development, Securities and Exchange Commission, the Department of the Treasury (the “Treasury”), or other government agencies.
- Make false, misleading, or derogatory statements about Fannie Mae, or its contingent workers, competitors, suppliers, business partners, or employees.
- Trade securities of any 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, relationship, or relationship may materially interfere with their ability to perform services for Fannie Mae
- **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
- **Potential Conflict of Interest:** Where there is a substantial risk of an Actual Conflict of Interest occurring
- **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