



CORPORATE POLICY

Subject: Equal Employment Opportunity, Anti-Harassment, and Reasonable Accommodation Policy

Policy Number: 3-201

Control Point: Employee Relations Associate General Counsel

Approval Authority: Executive Vice President - General Counsel and Corporate Secretary

Signature: William H. McDavid [Signature on original kept by Legal]

Summary

This Policy sets forth rules concerning prohibited discrimination and harassment in the workplace and the reasonable accommodation of disabilities and religion.

I. Prohibition of Improper Discrimination and Harassment

- a. Commitment to Equal Employment Opportunity (EEO). Freddie Mac is committed to providing its job applicants, employees, customers, and company visitors with a professional environment free from all forms of discrimination and harassment based on race, color, religion, sex, national origin, age, marital status, military service or veteran status, sexual orientation, gender identity/expression, physical and mental disability, pregnancy, ethnicity, genetic information or any other characteristic protected by applicable law (collectively referred to as “protected characteristics”). This Policy applies to all Freddie Mac employees, including employees on Freddie Mac business travel, at conferences, and at social events sponsored by Freddie Mac or its business partners.
- b. Discrimination. Freddie Mac makes all employment-related decisions (including hiring, termination, promotion, compensation, job assignment and training decisions) on the basis of legitimate, non-discriminatory business considerations and expressly prohibits discrimination based on any protected characteristics.
- c. Harassment. Freddie Mac prohibits harassment, defined as unwelcome conduct that denigrates or disparages others, interferes with another’s work performance or creates an intimidating, offensive or hostile environment on the basis of any protected characteristic. Conduct that is not so severe or pervasive as to constitute a violation of federal or state law may nonetheless be found, in Freddie Mac’s sole discretion, to violate this Policy. Examples of harassing conduct include:
 - Verbal communications, such as unwelcome or derogatory or hateful comments, jokes or threats, or requests for sexual favors;
 - Documentary materials, such as graphic material or photographic images;
 - Physical conduct, such as unwelcome physical contact, gestures, or expressions (this conduct may also violate Corporate Policy 3-210, Workplace Violence Prevention Policy);
 - Accessing, using or sending electronic materials such as harassing emails, texts or videos (further information regarding the use of electronic media can be found in Corporate Policy 6-300, Acceptable Use and Management of End User Technology); and
 - Taking, or refraining from taking, any employment action on the basis of an employee’s willingness to engage in a sexual relationship.

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II. Reasonable Accommodations

Freddie Mac is committed to affording equal employment opportunities to individuals with disabilities, as defined by the Americans With Disabilities Act. Employees may request an accommodation by following the [Job Modification Request Procedure](#). Candidates for employment may inform their recruiter if they need a reasonable accommodation during the pre- or post-offer stage of the hiring process. Freddie Mac will engage in an interactive process with employees or candidates for employment who request a reasonable accommodation based on a covered disability. In considering requests for reasonable accommodations based on disabilities, Freddie Mac and the Wellness Center will comply with all applicable federal, state or local disability discrimination laws.

Employees who would like an accommodation based upon their religious beliefs should discuss the need for such an accommodation with their manager or HR Connect, who will consult with appropriate parties to determine whether and how to grant the request.

III. Reporting Violations of this Policy

a. Reporting. Employees or applicants who believe they have observed or experienced actions in the workplace that may violate this policy are strongly encouraged to report their concerns immediately to any one of the following, as appropriate based upon the facts and circumstances:

- Any HR Business Partner
- HR Connect
- The Employee Relations Team (housed in the Legal Division).
- The [Compliance & Ethics Helpline](#).

In addition, any member of management who becomes aware of facts that may constitute a violation of this policy is required to report those facts through one of the channels described above. For purposes of this policy, “member of management” means any employee who has formal supervisory authority over one or more employees.

b. Investigations. Freddie Mac will thoroughly and impartially investigate allegations of potential violations of this policy. If the allegations are found to have merit, Freddie Mac will take prompt and appropriate remedial action.

c. Non-Employees. Non-employees of Freddie Mac, including customers, guests, independent contractors, and contingent workers, who believe this policy has been violated, should immediately report the suspected violation to their own employers. Freddie Mac encourages non-employees also to make Employee Relations (housed in the Legal Division) or an HR Business Partner aware of the suspected violation.

IV. Non-Retaliation

Freddie Mac strictly prohibits retaliation against employees or applicants who file complaints under this policy based on their reasonable belief that this policy has been violated. Freddie Mac also strictly prohibits retaliation against employees or applicants based on their participation in any investigation of potential violations of this policy. This prohibition on retaliation extends to adverse employment or post-employment actions, verbal abuse, or other adverse treatment in the workplace by either supervisors or by other employees. Each member of management is responsible for implementing this non-retaliation policy in his or her work group.



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Effective Date: April 3, 2017

- New**
- Replaces** Policy 3-201 dated April 4, 2016
- Reviewed by Legal or Determined that No Legal Review Necessary