

Multifamily Selling and Servicing Guide

Effective as of June 30, 2025

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TABLE OF CONTENTS

Part V Section 505 Compliance	3
GLOSSARY	4

Effective: 06/30/2025



Section 505 Compliance

▼ Requirements

You must:

- maintain effective OFAC compliance procedures;
- monthly screen:
 - the Borrower, Key Principal, Guarantor, and Principals for Potential Red Flags for Mortgage Fraud and Other Suspicious Activity; and
 - all Persons per Part I, Chapter 3: Borrower, Guarantor, Key Principals, and Principals, Section 310: Compliance; and
- report:
 - all unresolved red flags per Part I, Chapter 3: Borrower, Guarantor, Key Principals, and Principals, Section 310: Compliance; and

Effective: 06/30/2025

 within 24 hours, any Blocked Person to Lender Assessment Oversight.



Glossary

B

Blocked Person

Any Person who is:

- on the FHFA SCP List:
- sanctioned or blocked by OFAC; or
- identified on:
- HUD's "Limited Denial of Participation, HUD Funding Disqualifications and Voluntary Abstentions List"; or
- General Services Administration's "System for Award Management (SAM) exclusion list".

Borrower

Person who is the obligor per the Note.

Synonyms

- Borrowers
- Borrower's

G

Guarantor

Key Principal or other Person executing a

- Payment Guaranty,
- · Non-Recourse Guaranty, or
- any other Mortgage Loan guaranty.

Synonyms

Guarantors

K

Key Principal

Person who

- controls and/or manages the Borrower or the Property,
- is critical to the successful operation and management of the Borrower and the Property, and/or

Effective: 06/30/2025

• may be required to provide a Guaranty.

Synonyms

- Key Principals
- Key Principal's



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Lender Assessment

Oversight

Team that can be contacted at

 $lender assessment_over sight team @fanniemae.com.\\$

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OFAC

U.S. Treasury Department, Office of Foreign Assets

Effective: 06/30/2025

Control.