

Anti-Bribery and Corruption Program

Adopted March 26, 2021

The following is a synopsis of MetLife's Global Anti-Bribery and Corruption policy and program.

MetLife, Inc. operates worldwide through subsidiaries, affiliates, branches, and joint ventures (collectively referred to as “MetLife” or “the Company”). The Company is firmly committed to acting professionally, fairly and with integrity in all our business dealings and relationships and in the promotion of global goals.

Corruption violates the public trust, threatens economic and social development, and impedes fair trade. To combat corruption, most of the countries in which MetLife conducts business have enacted anti-corruption laws and regulations that criminalize corrupt behavior. To comply with these laws and regulations, MetLife has adopted a zero-tolerance policy towards all forms of bribery and corruption, whether committed by MetLife employees or by a third party acting for or on behalf of MetLife.

Our Global Anti-Corruption Policy (the “Policy”) sets forth guidelines and procedures designed to mitigate bribery and corruption risks, promote integrity, transparency, and “do the right thing” as an integral part of our corporate culture, and advance our reputation for trustworthiness throughout the world.

MetLife strictly prohibits bribery or corruption in business dealings in both the private and public sectors. The Policy therefore prohibits directly or indirectly offering or accepting anything of value (including cash, gifts, entertainment, meals, travel, business, employment, etc.) to:

- (i) Improperly influence any act, omission, or decision in the performance of some official, public, or business-related function or obtain an advantage on behalf of MetLife; or,
- (ii) Secure an improper advantage in order to obtain, retain, or direct business.

Notably, the Policy prohibits making facilitation payments to cause a government official to expedite or secure a routine governmental action. Under the Policy, each MetLife operation is required to implement processes and controls to deter, prevent, and detect potential acts of bribery or corruption. This also applies to any third party retained by MetLife. Other key features of the Policy include:

- (i) Appointment of a Global Anti-Bribery and Corruption (“ABC”) Compliance Officer;
- (ii) Guidelines for requiring pre-approval for gifts to and from, and entertainment with government officials and non-government persons;
- (iii) Requirement to maintain books, records, and accounts that fairly and accurately reflect MetLife's business transactions (including underlying income, expenses, profits, losses and disposition of assets) in reasonable detail;
- (iv) Conduct due diligence and oversight of intermediaries/agents, and entities acting on behalf of the Company to ensure that such parties have the requisite expertise to perform the work in question and will do so in a manner that fully complies with anti-corruption laws;

and,

- (v) Reporting potential corruption-related issues, with a prohibition on retaliation against any employee who reports any allegation of bribery or corruption in good faith.

The Company's Anti-Corruption Compliance Program is designed to implement the Policy's requirements, as well as identify and mitigate the risk of non-compliance with those requirements. Program components include:

- (i) Ongoing training, awareness, and guidance on anti-corruption laws and regulations provided to senior management, key operating personnel, and other employees;
- (ii) Periodic assessment of corruption risks and the effectiveness of controls;
- (iii) Establishing guidelines for acceptable behavior on providing gifts and entertainments; and,
- (iv) Reviewing of agreements to assess anti-corruption risk and oversight of the enhanced due diligence process for potential high-risk third parties.

We evaluate our existing policies, procedures, training and technologies as necessary to address the changing environment.