MetLife’s Code of Business Ethics
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Our Leadership

At MetLife, we don’t just work for a company. We carry on a legacy.

For more than 150 years, we’ve been helping people protect their families and finances so they can realize their full potential.

Because of this legacy, our customers expect us to get things right. More than that, they expect us to do things the right way — to exemplify the honesty, integrity and respect that have defined this company since 1868.

MetLife’s Code of Business Ethics helps us live our values with every customer, every day. It helps us navigate an always-changing external environment while meeting the highest professional standards. For these reasons, the Code represents the foundation of our culture, our identity, and our long-term success.

Each of us is an ambassador for MetLife, which means each of us contributes to the company’s reputation. With that in mind, please make sure you read, understand and follow all aspects of our Code, and please feel empowered to speak up if you ever notice anything that conflicts with our values and standards.

MetLife has changed a lot over the past century and a half. The one constant has been the quality of our people and their commitment to our purpose. We are always with you, building a more confident future.

Michel Khalaf
President and CEO
MetLife
Our Legacy

For more than 150 years, MetLife has helped generations of people build a more confident future. Whether you are new to MetLife or familiar with our rich legacy, we’re proud to share the foundation upon which MetLife was built.

Metropolitan Life Insurance Company (MetLife) opened for business in New York City on March 24, 1868 – this was before the invention of the telephone, before electric lights were widely used, and before the development of the gas-powered automobile. Our first home office was comprised of two rooms, just enough space for the employees at the time – six in total.

At first, MetLife focused on life insurance. In 1871, MetLife began providing policyholders with information about health and hygiene, a tradition that has endured. In 1879, we became the first insurance company in America to offer industrial insurance. Industrial insurance ensured financial support in the event of the primary wage earner’s death and was easily obtained and affordable. Unlike other insurance policies, this type of insurance was issued in small amounts on which premiums were collected weekly or monthly at the policyholder’s home. By 1880 MetLife was signing 700 new industrial policies per day. And still, to ensure familiarity and personal contact, our agents would visit each policyholder at the same time each week.

In 1909, MetLife took an active lead in promoting the social role of insurance by embarking on an unusual and expansive humanitarian program with the goal to provide support to the underprivileged. The most notable project stemming from this program was the Metropolitan Life Insurance Company Visiting Nurse Service, which ran from 1909 to 1953. The nurses distributed important information about good health and cleanliness; ultimately improving the well-being of the underserved and reducing the high mortality rates for contagious diseases such as tuberculosis.

MetLife played a role in responding to several major historical events, including the 1906 San Francisco earthquake and fire, the sinking of the Titanic in 1912, and America’s entry into World War I in 1917. In each case, MetLife was the first insurance company to act by paying claims expediently and even helping with the relief efforts.

To this day, MetLife continues to conduct business fairly and transparently, always putting our customers first and staying true to our legacy. The 2010 acquisition of Alico greatly expanded MetLife’s global footprint. Today, we operate in over 44 countries worldwide and employ more than 48,000 people. We help families, businesses, and communities not just survive, but thrive. Let’s look back with pride on everything we’ve built together, and ahead to what can still be achieved.
Owning Our Code

In this section:

Know Your Responsibilities as a Manager

Make Ethical Decisions
Know Your Responsibilities

MetLife’s legacy continues with its employees. Caring for people is the foundation of our roles at MetLife. We have worked hard to create a culture where every employee takes responsibility for their actions and adopts an ownership mindset. We all have a personal stake in MetLife’s success. As a MetLife employee, your behavior and decisions reflect on MetLife. Always conduct yourself in a way that aligns with MetLife’s values.

Our Code, together with MetLife’s policies, gives you the information you need to perform your job ethically and in line with MetLife’s standards, laws, and regulations. It is your responsibility to understand how these apply to the work you do and the decisions you make.

- Take time to read our Code and refer to it often to help you understand MetLife’s expectations.
- Take personal responsibility for your actions and understand that your behavior matters and impacts MetLife’s ethical culture and reputation.
- Collaborate and communicate among different groups in the organization.
- Prevent misconduct and speak up if you observe a suspected violation. Report concerns immediately and cooperate in the investigation, if needed.
- Affirm your commitment to and compliance with our Code during our annual Code training and Conflict of Interest Disclosure Program.
- Complete your mandatory training on time to stay up-to-date on what’s expected of you.

MetLife’s Code applies to all MetLife employees including senior management. MetLife’s performance management program promotes conduct as required by the Code. Violations of our Code and policies, or any applicable laws and regulations, may result in disciplinary action, up to and including termination of employment with MetLife.

We expect all those who work with MetLife, whether as an employee or as a non-employee worker, vendor, or other third party, will act in a way consistent with our values, and adhere to our standards as described here and in our Supplier Code of Business Ethics.

What If?

What should I do if there is a conflict between what’s in the Code and local laws and regulations?

If you have questions, reach out to the Law Department.

1870 – A publication distributed to agents outlining their duties and responsibilities.

1914 – Field training.
Know Your Responsibilities as a Manager

As a manager at MetLife, the way you make decisions, handle concerns and conflicting opinions, or even address unpopular issues set the tone for trust with your employees. You are influential and your behavior and interactions with your employees matter. The decisions you make impact your employees’ performance and satisfaction. It’s critical that you set a good example by exemplifying your commitment to our Code and purpose and empower your employees to do the same. It is your responsibility to foster an ethical culture and a supportive environment where your employees feel comfortable raising questions and concerns to you.

As a manager you are highly visible; employees observe your behaviors and emulate them. Make sure that you are setting the appropriate ethical tone and that your actions match.

- Act as a role model by demonstrating the standards in our Code, living the values, and encouraging your employees to do the same.
- Foster an environment where your employees feel comfortable and supported when they speak up and come forward with questions and concerns.
- Do not directly or indirectly retaliate against anyone for sharing concerns in good faith or supporting an investigation. Be sure others know you expect the same from them.
Make Ethical Decisions

At MetLife, we strive to do what is right for our people, customers, and shareholders. We are all responsible for making ethical decisions every day, but “the right thing to do” may not always be clear. Conflicting priorities or business pressures may cause you to question your judgment.

You are not alone. MetLife’s Code and values are here to guide you in making ethical decisions.

Though the Code doesn’t offer an answer for every situation, it can empower you to make decisions that uphold our principles and protect our people and our reputation. Use the resources available, trust your judgment, and seek guidance if you need additional assistance.

As an employee you have a right to your personal ethics, but MetLife’s business ethics must guide your business-related decisions and conduct.

Personal Ethics are the values, beliefs, and judgments that YOU hold personally.

Business Ethics are MetLife’s values and standards that must be followed by all employees.

What If?

What if a customer submits a claim that does not qualify for payment, but you feel bad for the customer and want to pay it?

MetLife has policies and procedures for paying claims. In this situation, following your personal feelings may cause you to violate those MetLife policies.
Caring for Our People

In this section:

- Promote Equal Opportunity for All
- Respect Others
- Promote a Safe and Secure Workplace

Speak Up!
Do Not Tolerate Retaliation
Promote Equal Opportunity for All

At MetLife, we focus on attracting, developing, and retaining employees with diverse skills, talents, backgrounds, and experiences. Our differences allow us to innovate and to succeed in our mission to serve individuals, families, businesses, and communities worldwide. Our policy is to ensure equal employment and advancement opportunities for all individuals working at MetLife.

We comply with all applicable employment and labor laws and are committed to providing a diverse and inclusive work environment, free of all forms of unlawful harassment and discrimination, including any type of harassment or discrimination based on race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, national origin, marital or domestic/civil partnership status, genetic information, citizenship status, uniformed service member or veteran status, or any other characteristic protected by law.

1877 – Carrie Foster, our first female associate.
Respect Others

MetLife strives for a workplace culture where our employees feel engaged, motivated, and inspired each day. This culture encourages us to listen and respond to one another’s ideas and needs. Our openness and courage to embrace different points of view and welcome change cultivates a diverse, inclusive, and collaborative place to work. It is incumbent on every employee of MetLife to nurture our culture of respect and inclusion.

We demonstrate our commitment to inclusion and collaboration by acting professionally and treating one another with respect and kindness. Engaging in behavior that is malicious, obscene, threatening, or intimidating disrupts the safe and productive work environment that we strive for every day. As employees of MetLife, our goal should always be to behave in a way that supports and fosters a safe work environment that is free of harassment or discrimination. If you experience or witness behavior that is inconsistent with MetLife’s principles or that you believe, in good faith, violates MetLife’s policies, it is your duty to speak up and report it.

Harassment can be a type of unlawful discrimination if it is based on a person’s protected personal characteristic, but harassment can also be any unwelcome, offensive or degrading comments or conduct, including any form of bullying or threatening actions. Harassment of any kind is determined by the reasonable perception of your actions by others, regardless of your intention. All forms of harassment violate our Code – and applicable MetLife policies – and may be illegal. Actions or words that harass or intimidate others are strictly prohibited and will not be tolerated. If you are aware of a situation involving these behaviors, report it immediately.

We each have a responsibility to make sure our workplace is a welcoming environment, free from harassment. Harassment can come in many forms, and may include, but is not limited to:

- Comments about a personal characteristic that are unwelcome, offensive or degrading.
- Explicit or degrading remarks about appearance.
- Unwanted sexual advances or repeated requests for dates.
- Pictures, messages, or jokes that degrade or that may be considered offensive based on a personal characteristic.
- Unwanted physical contact.

Find Out More

- Global Workplace Statement
- Global Diversity and Inclusion

We each have a responsibility to make sure our workplace is a welcoming environment, free from harassment. Harassment can come in many forms, and may include, but is not limited to:

- Comments about a personal characteristic that are unwelcome, offensive or degrading.
- Explicit or degrading remarks about appearance.
- Unwanted sexual advances or repeated requests for dates.
- Pictures, messages, or jokes that degrade or that may be considered offensive based on a personal characteristic.
- Unwanted physical contact.
Promote a Safe and Secure Workplace

MetLife is committed to protecting the safety and well-being of all individuals in our workplace. As such, threats, threatening or menacing behavior, stalking, harassment or acts of violence, including any such actions conducted online, against employees, visitors, customers or any individuals on MetLife’s property or while engaging in, or related to, company business and activities, or the workplace, will not be tolerated. If you are aware of a situation involving these behaviors, report it immediately. The possession of weapons of any kind, including firearms, while in the workplace, including parking areas, or while otherwise engaged in company activities, is strictly prohibited to the fullest extent permitted by law.

MetLife will remove any person exhibiting the behaviors listed above from the workplace. Violations of this policy will result in disciplinary action up to and including termination of employment at MetLife.

MetLife will immediately and appropriately investigate incidents of violence, threats of violence or other misconduct referenced above in accordance with applicable policies and laws. Reported incidents will be handled as confidentially as appropriate or possible. MetLife reserves the right to report such situations to appropriate law enforcement authorities and/or to notify agencies that offer medical, psychological or other professional assistance, as appropriate.

In case of an emergency, where an immediate threat exists, call your local law enforcement agency and notify building security (if available on-site).

In non-emergency cases where concerns may arise regarding aggressive, intimidating, potentially harmful or threatening behaviors, or other troubling situations, contact Local or Regional Human Resources or Employee Relations, or report the matter through the Speak Up tool.
Speak Up!

It takes courage to come forward and share your concerns. Follow our Code and values to hold yourself and others accountable for raising issues and concerns. You don’t have to have all the details or be sure that something is wrong to raise a concern or report a violation of our Code, our policies or laws and regulations.

Understand the importance of speaking up!
- By speaking up, you give MetLife the opportunity to correct an issue and make improvements.
- If the appropriate people don’t know something is wrong, they cannot take action to fix it.
- If issues and concerns are not raised, then trust in MetLife may decrease, which harms our reputation and credibility.

You should report concerns using the channel that is most comfortable for you. You may reach out to your manager first. He or she is more than likely in the best position to understand your concern and take appropriate actions. If you are uncomfortable raising your concern to your manager, or any level of management, the following resources are available:
- **Speak Up tool**
- **Special Investigations Unit**
- **Local or Regional Compliance**
- **Local or Regional Helpdesk or Whistleblowing Contact**
- **Local or Regional Human Resources or Employee Relations**
- **Global Ethics**

All reports are taken seriously, and will be investigated and addressed, as appropriate. You may not always learn the outcome of the concern you report. Due to privacy concerns, information will be shared on a need-to-know basis and sometimes that includes only the people directly involved in pursuing a resolution. All MetLife employees are required to cooperate in investigations.

You may report your concern anonymously to the extent permitted by law using the Ethics & Fraud HelpLine – online or by phone. The Ethics & Fraud HelpLine is administered by a third party and persons reporting will not be tracked.

**Manager Tip!**

What to do after your employee reports a concern directly to you:
- Ensure the concern is reported or report it yourself through the appropriate channels.
- Maintain as much confidentiality as possible.
- Refrain from conducting your own investigation.
- Remain accessible to investigators and any employees involved in the investigation.
- Be careful not to make representations about the outcome of the investigation.
- Reach out to the appropriate resources if you need information and guidance.

Find Out More
- **Speak Up tool**
- **What Happens When I Report?**
Do Not Tolerate Retaliation

MetLife is committed to preventing and addressing retaliation to protect our employees. MetLife prohibits any form of retaliation against an employee for raising a concern in good faith or assisting with an investigation regarding a potential violation of our Code, our policies or laws and regulations.

Manager Tip!

Never engage in retaliation and prevent retaliation against others. Your actions are visible to your employees. Know the actions that are considered to be retaliation and avoid them. Tell your employees that they can come to you if they suspect that they or someone else is being retaliated against, and that you will handle it appropriately and confidentially.

As a manager, it’s important to show employees we are committed to ensuring that our workplace is retaliation free.

Examples of Direct Retaliation include, but are not limited to:

• Making threats, discriminating against, or harassing someone.
• Demoting or terminating an employee without “just cause” or a legitimate business reason.
• Providing an unjustified or unsupported negative performance review.
• Restricting compensation without “just cause” or a legitimate business reason.
• Denying eligible employee benefits or training opportunities provided to all others.

Examples of Indirect or Soft Retaliation include, but are not limited to:

• Assigning someone an unpopular job or arbitrarily increasing or decreasing his or her workload without a legitimate business reason.
• Withholding information or excluding someone from meetings, events, or discussions that he or she should participate in.
• Intentionally failing to recognize someone for work well done.
• Setting unrealistic deadlines to cause an employee to fail.
• Ignoring or refusing to meet with the employee, speaking curtly or rudely, or acting in ways that embarrass the person.

In some instances, taking legitimate employment actions close in time to an employee engaging in protected activity can create the perception of retaliation and create legal risk. Therefore, you should always be mindful of your actions when engaging with employees who have reported an issue or participated in an investigation.

What Is Retaliation?

Retaliation is targeting or treating employees less favorably because they engaged in a protected activity. Examples of protected activity include, but are not limited to, raising concerns about harassment, participating in an investigation, or refusing instructions to do something that would violate MetLife’s policies.

If you know, or suspect, that you or someone else has experienced retaliation, please report it immediately.
Preserving Our Way of Business

In this section:

Avoid Conflicts of Interest
Communicate with Care
Sell Our Products and Services Ethically
Prevent Bribery and Corruption
Prevent Money Laundering
Engage in Political and Government Related Activities Responsibly
Compete Fairly
Do Not Trade While You Know Material Non-Public Information
Avoid Conflicts of Interest

As MetLife employees, we should never put personal gain or benefit ahead of the interests of MetLife, our customers, and shareholders. A conflict of interest occurs when your personal interests interfere, or appear to interfere, with your ability to be objective or perform your role at MetLife. This includes situations where what is in your personal best interest is not in the best interest of MetLife, our customers, and shareholders. It’s important to understand that a conflict of interest may still exist even if nothing unethical or improper occurs.

We have a commitment to MetLife, our customers, shareholders, and each other to act with integrity and hold ourselves accountable. All MetLife employees are required to disclose all actual, perceived, and potential conflicts of interest through our Conflict of Interest Disclosure Program and to cooperate with any management plans or investigations that result from a disclosure. By disclosing this information, you are protecting MetLife, our customers, shareholders, yourself, and your colleagues by allowing MetLife to mitigate any harm that may result from these conflicts, including loss of trust, credibility or damage to MetLife’s reputation. Always remember, a conflict situation is not necessarily a violation of MetLife’s policy, but failing to promptly disclose a possible conflict situation is always a violation of our Code.

There are three types of conflicts of interest: actual, perceived, and potential.

- An actual conflict of interest – A direct conflict between your existing personal interests and your current duties and responsibilities, and/or your ability to be objective in your role at MetLife.

- A perceived conflict of interest - Where it appears that your private interests improperly influence the performance of your duties and responsibilities, and/or your ability to be objective in your role at MetLife.

- A potential conflict of interest - When a conflict between your personal interests and your duties and responsibilities, and/or your ability to be objective in your role at MetLife could arise in the future.

Manager Tip!

Managers have the following responsibilities in managing conflicts of interest:

- Ensure that all the employees you supervise complete the mandatory Conflict of Interest Disclosure within the required timeframe.

- Review and approve all conflict of interest disclosures submitted by your employees in the Conflict of Interest Disclosure Tool.

- Escalate the disclosures to a more senior level of management for review, if necessary.

- If a disclosure requires, create a management plan for approval by all key stakeholders and ensure the employee complies with the requirements.
Avoid Conflicts of Interest (continued)

If you are in doubt about whether to disclose an outside business activity, personal relationship, or other situation, consider the perspective of an outsider. If an outsider would reasonably think there is a conflict of interest, then it is best to disclose the information. Remember, not disclosing a possible conflict situation is a violation of our Code. If you are still unsure if something is a conflict of interest, seek guidance from your manager, a senior manager in your line of business, or Global Ethics.

What If?

What should you do if you are asked to serve on a board as a representative of MetLife?

Before accepting a board or advisory position where you would represent MetLife, refer to MetLife’s Stakeholder Engagement Policies. Once approved, make sure to disclose the position in accordance with the COI guidance and your local requirements.

What If?

What should you keep in mind if you are considering running for public office?

As an employee of MetLife, you may run for a federal, state, or local elected public office or hold an appointed or elected federal, state, or local public office. However, you cannot run for an elected political office or hold an elected or appointed political office on behalf of MetLife, or as a representative of MetLife.

Please contact Global Government Relations to submit a request to run for or hold public office, or ask any questions related to running or holding a public office.

Find Out More
- Global Ethics
- Stakeholder Engagement Policies
Communicate with Care

When communicating with external parties, we must protect MetLife’s reputation and brand. In our communications we must take care to exhibit the standards and principles that are integral to MetLife’s success.

Always remember that you should never make statements or speak on behalf of MetLife, unless specifically authorized. All media (e.g. interviews, news releases), public speaking, and thought leadership activities as well as inviting external speakers to MetLife, require senior leadership approval. Please refer any media inquiries to your Global Communications Business Partner immediately.

Follow our general guidelines for interacting on social media sites for business and non-business (personal) use, including, but not limited to: Facebook, Twitter, Pinterest, LinkedIn, Instagram, YouTube, blogs, wikis and chat rooms. Make sure to check your local policies and regulations before taking any action.

- Be transparent. If you publish content on social media about MetLife or its business, you should make clear that you are a MetLife employee and that the views you express are your own.
- Uphold confidentiality. Protect the confidentiality of customer information and the company’s trade secrets and confidential financial and business-related information.
- Be respectful. Do not post things that reasonably could be viewed as discriminatory, malicious, obscene, threatening, intimidating or that might constitute threats of violence, harassment or bullying. Examples include posts intended to harm or sabotage someone’s reputation or that contribute to a hostile work environment on the basis of any status protected by law or company policy. Don’t disparage MetLife’s customers, consumers, and suppliers.
- Be accurate. Consider accuracy before you post. If you make a mistake, you should correct it quickly. Never post information or rumors that you know to be false about MetLife, employees, customers, consumers, suppliers, people working on behalf of MetLife, or competitors.

Find Out More

- Stakeholder Engagement Policies
- Social Media Policy
- Internal Social Policy

Internal communications are as important as external ones. You are required to comply with our Code, our Internal Social Policy, and laws when communicating internally to protect MetLife’s information.

You should not use social media sites or other external communications to solicit business or promote product and service offerings unless permitted under applicable regulations and as part of a Company-approved program or policy.
Sell Our Products and Services Ethically

“Sales Practices” means any activity conducted by or on behalf of MetLife to influence a customer’s decision with respect to a product or service.

MetLife has established a culture of ethical sales that centers on treating the customer fairly. Our Code, our policies and laws ensure that we conduct business in a manner that ensures fairness, clarity, and transparency. Our ethical sales practices strengthen MetLife’s reputation and help us earn the trust and loyalty of our customers as well as the privilege of partnering with them in their financial journey.

To behave consistently with our standards and purpose, we must know and comply with the policies and procedures that apply to our roles and:

• Listen to our customers.
• Only make statements that are factual, truthful, and completely accurate.
• Ensure products developed and marketed are appropriate for the targeted customers.
• Allow our customers the freedom to choose appropriate products or services.
• Train our sales representatives to properly advise customers and uphold MetLife’s high standards.
Prevent Bribery and Corruption

MetLife is committed to conducting business fairly, honestly and openly and has adopted a zero-tolerance policy towards all forms of bribery and corruption committed by MetLife employees or by a third party acting for or on behalf of MetLife. Simply put, bribery and corruption are never acceptable.

Regardless of local law or practice, MetLife strictly prohibits employees from giving “grease” payments or offering anything of value with the intention of influencing the recipient to act improperly. Improper actions include expediting a routine duty or function, obtaining or retaining business, or securing an improper business advantage. This prohibition applies whether dealing with government officials, customers, or other third parties.

The three main types of corrupt activities are bribery, kickbacks, and extortion.

- **Bribery** – Offering, giving, soliciting, or receiving anything of value to influence the actions of another person or entity.
- **Kickback** – A negotiated form of bribery in which payment is made to someone who facilitated a transaction or other situation.
- **Extortion** – Using threats or force to obtain money, property, or services.

To preserve the trust and confidence of our customers, shareholders, and other third parties, it is vital that as employees of MetLife we keep as much distance as possible between ourselves and any indication of corrupt practices. We have committed to conduct business honestly, fairly, and transparently. Corrupt activities may also be a serious violation of criminal and civil anti-bribery and anticorruption laws in the countries in which we operate and can carry severe consequences.

U.S. and local laws and regulations prohibit providing direct or indirect services to or otherwise transacting with sanctioned individuals, entities, countries, or governments. MetLife’s Sanctions compliance policies and procedures are designed to comply with local economic sanctions regulations. You have a responsibility to know and comply with the policies and procedures that apply to you.

Prior to giving or accepting gifts and entertainment of any kind, you must refer to the Global Anti-Corruption Policy and your local policy and comply with legal requirements. Gifts and entertainment in some instances require pre-approval by your manager and Compliance in addition to timely reporting.

Refer to the Global Anti-Corruption Policy to determine if an expenditure for gifts, entertainment, meals, travel, lodging or ticketed events, to or from a government or non-government official (e.g. third parties or customers) requires pre-approval and timely reporting to management and Compliance.

You are prohibited in giving or accepting anything of value (e.g. a gift) if it is:

- Extravagant or expensive
- Cash or cash equivalents (such as gift cards)
- Anything prohibited by U.S. or local laws and regulations
- An actual or perceived bribe or kickback
- Services or non-cash benefits (such as the promise of employment)
- Intended to influence any act or decision or otherwise secure an improper advantage to assist the company in obtaining or retaining business

If you even suspect bribery, corruption, or money laundering activities, report it to the appropriate channels immediately. If you have questions, contact the Global Financial Crimes Unit.

Find Out More

- Global Anti-Corruption Policy
Prevent Money Laundering

Money laundering is the process of taking the proceeds of illegal activity and making them appear legitimate.

Money laundering is generally accomplished in three steps:
- Placing cash or other assets into the financial system.
- “Layering” the assets by moving them around multiple accounts or financial institutions.
- Integrating the assets back into the mainstream economy.

To prevent money laundering, we must be watchful and always accurately perform due diligence on our potential customers and other third parties. As MetLife employees, it’s important to speak up when something raises our suspicions or doesn’t feel quite right.

Engage in Political and Government Related Activities Responsibly

There are increased risks when interacting with government officials. Special procedures apply, including preclearance requirements, when providing anything of value directly or indirectly to a government official on behalf of MetLife or personally. This includes political contributions. Refer to the Global Anti-Corruption Policy for guidance.

Political and Government Related Activities

- Do not use MetLife’s resources including, but not limited to, time, premises, or funds for your personal involvement with political and governmental affairs.
- Contact Global Government Relations prior to using MetLife’s resources to provide corporate support for any political candidate, committee, or purpose.
- Engaging with government officials may subject MetLife and/or its employees to regulatory disclosure requirements. Contact Global Government Relations before contacting a government or public official and before joining any association that engages with government officials.
- Senior management approval is required prior to promoting an outside charitable organization in the workplace or using MetLife resources in connection with such charitable organization that involves government and/or elected officials, their spouses, or candidates for public office.

Find Out More

- Global Anti-Money Laundering Policy
- Global Anti-Corruption Policy
Compete Fairly

Competition laws, also known as antitrust, cartel or monopoly laws, are designed to preserve and foster free and open competition, efficient services, and a productive economy. Any activity or conduct that reduces or eliminates competition is subject to scrutiny. Even the appearance of an understanding with a competitor may be enough to draw scrutiny and lead to serious penalties. You must take care to avoid even inadvertent violations of these laws.

At MetLife, we treat others the way that we want to be treated, including our competitors and that means treating them with respect. You should avoid making disparaging statements about competitors of MetLife, their products, or services. At MetLife, we compete vigorously and fairly and always act within the laws and regulations of the countries in which we do business.

When you are in contact with our competitors, it is best to avoid discussions of certain sensitive business information and to stop a conversation immediately if these topics or related topics are raised.

You should never:

- Fix prices or terms on the products and services that we sell.
- Agree to divide markets, customers, or territories.
- Agree not to compete for customers or in lines of business.
- Agree to boycott customers, suppliers, or other competitors.
- Agree to fix salaries or wages and/or agree to no-poaching agreements.
Do Not Trade While You Know Material Non-Public Information

You may not buy or sell securities while you know non-public information that is material to the securities, including MetLife securities. “Insider trading” occurs when you buy or sell securities at such a time. “Tipping” occurs when you provide material non-public information to someone else and that person buys or sells the related securities.

At MetLife, we maintain trust with our shareholders, customers, and third parties by not trading securities while aware of material non-public information and not tipping others to trade. In your work, you may learn material non-public information about MetLife, our third parties, or another company. Because the definition of material non-public information can be applied broadly, you should think carefully before you trade in securities and you should not discuss any sensitive or confidential information regarding MetLife or another company with family, friends or business associates.

What If?

How do I know if information is material?

Information may be material if it would be likely to affect the market price of the security or if a reasonable investor would consider the information important in deciding whether to buy or sell the security. Examples may include financial results, mergers or acquisitions, purchases or sales of a business, new products or businesses, or changes in executive management. Insider trading and tipping violate MetLife’s policy and local laws.

What If?

I don’t live in the United States, can I be penalized for insider trading?

Yes. As an employee, if you violate this Code or MetLife’s Insider Trading Policy, MetLife may subject you to disciplinary action up to and including termination of employment. Additionally, you could go to jail, be fined, be obligated to pay monetary damages, and be subject to other local legal consequences.
In this section:

Handle our Data with Care
Maintain Accurate Records
Protect our Personal Information
Safeguard Our Assets
Handle Our Data with Care

As a digital company, data is a critical asset. Our day-to-day business relies on the accuracy and quality of our data. You are responsible for understanding the type of data you work with, what purposes it should be used for, and the potential risks and liabilities when using it for unintended purposes. All data that you work with must be handled with the greatest care to ensure its integrity for use in our processes. Our data governance policy provides guidance to assure our data is available, usable, of high quality, and secure. Treat the data of our customers, employees and third parties with care.
Protect Our Personal Information

MetLife has a long-standing commitment to protect personal information. Our customers, employees, and third parties trust us to protect and limit use of their personal information and respect their privacy. Personal information is any information that identifies or can identify an individual such as name, email address, government identification number, account number, medical information, and user ID and password.

MetLife conducts business in many countries that have privacy laws and/or regulations, that outline how personal information can be viewed, collected, stored, processed, transferred and destroyed. Additional legal restrictions may apply to processing sensitive personal information. It’s important to understand what personal information is and follow the privacy laws and regulations in the country or countries where you conduct business. If you have questions regarding legal requirements, please reach out to the Law Department.

All MetLife employees are required to identify, report and prevent personal data incidents. A personal data incident is any disclosure, exposure, loss, unauthorized access or misdirection that may compromise personal information. Even innocent actions, like a misdirected email, could result in a personal data incident if there is personal information involved. A personal data incident may or may not be considered a “security breach” as defined by applicable law. It’s important that you report any suspected personal data incidents through the appropriate channels. Compliance will work with the Law Department to determine if a data breach occurred based on local privacy laws and if notification to regulator(s) or individual(s) is required.

Examples of personal data incidents include, but are not limited to:
- Emailing or mailing documents with personal information to the wrong customer.
- Posting personal information to an unsecured shared site.
- Losing a company laptop, phone or other device.

Privacy best practices:
- Minimize the collection, sharing, and use of personal information only to what is needed to perform your work.
- Collect, use and process personal information only in a manner that is consistent with the purposes stated in the privacy notice and required consents.
- Comply with MetLife’s clean desk and information destruction requirements.
- Send emails that contain personal information in a secure manner to recipients outside of MetLife.
- Share personal information only with approved third parties, and only for legitimate business purposes.
- Consult the Law Department before transferring personal information across country borders, as some countries restrict such transfers.

Find Out More
- Global Privacy Policy
- Privacy Knowledge Sharing Site
Safeguard Our Assets

MetLife’s assets include everything that MetLife owns or uses to conduct business. Assets range from buildings, computers, and mobile devices that MetLife provides to the emails on MetLife’s network and our intellectual property. We are entrusted to use MetLife’s assets for business and protect them from damage, loss, misuse and theft. Occasional personal use of MetLife’s assets is permitted; however, make sure your use doesn’t interfere with our business or violate our policies or applicable law.

Do not have any expectations of privacy when using MetLife’s assets. Your use of MetLife’s assets may be monitored. Any email you send on MetLife’s network, document you download and store on your computer, or code you develop during your work is MetLife’s property.

MetLife invests significant time and money to develop and protect our confidential information and intellectual property such as patents, copyrights, trademarks, and trade secrets as valuable MetLife assets, including any created by you in connection with your work for MetLife. If you create something during your employment here, MetLife owns it unless you meet certain criteria under our policies and/or under the law. Remember that MetLife’s ownership of these assets continues even after you leave MetLife.

MetLife maintains a robust Cybersecurity Program with regional Cybersecurity plans and annual tabletop exercises around the globe. Our plan establishes a framework to facilitate a coordinated, effective response to large scale and complex data incidents. All employees with designated roles and responsibilities under the plan are responsible for ensuring they are aware of and comply with the most current version of the plan.

If you have created intellectual property related to your employment while an employee of MetLife, then MetLife owns it. Remember that MetLife’s ownership of these assets continues even after you leave MetLife.

1868 – The leather box that held the company assets.

You should not use intellectual property owned by a third party unless that intellectual property has been properly licensed by MetLife. Use of photos, graphics, software, music and other intellectual property on behalf of MetLife is typically considered commercial use and, as such, requires certain permissions before use. The Law Department is available to assist you with identifying and using such materials.

What If?

Can I put any photo in my presentation?

Before you use a photo, you need to validate you can use the picture in compliance with the applicable laws, including requirements for consent. If it is owned by a third party, you need to verify that MetLife has secured the right to use it. If you have questions, reach out to the Law Department.
As a large financial services company, customers, shareholders, and others expect our records to be accurate, reliable, and complete. It is of upmost importance that we meet the expectations of these key stakeholders to maintain trust, give a clear picture of our financial health, and enable ourselves and others to make sound business decisions. We must also maintain strict compliance with all laws and regulations governing disclosure, financial reporting, accounting, and records.

As an employee of MetLife, you must exercise responsible use of, and control over, any records to which you have access. The integrity of our records and our reputation relies on each employee ensuring that all financial, accounting, and operations related records are accurate, consistent, timely, and complete.

MetLife may be subject to audit or examination from time to time. MetLife policies and laws or regulations require that we cooperate fully with all appropriate requests for information. Similarly, we must not attempt to influence or interfere with an audit or examination, and we must always provide information that is accurate to the best of our knowledge.

What If?

I made a small error on an expense report I just submitted – the amount I input is only slightly more than the actual cost. Do I need to correct the report?

Yes, because MetLife is a financial services company, all records must be above reproach and accurately kept. Even small discrepancies are a red flag for regulators and auditors.

What If?

I don't work in finance, do these Code requirements regarding keeping accurate records apply to me?

Yes, all MetLife employees are personally responsible for ensuring that all business records are accurate, complete and reliable. This same standard applies to all reports and records prepared for internal or external purposes.
Maintain Accurate Records (continued)

All records and non-records must be maintained in accordance with our Information Lifecycle Management Program. Records must be retained as required by the MetLife Record Retention Schedule and securely disposed of at the end of their retention period. Non-records must be securely disposed of when no longer needed and should not be retained longer than six years. However, any information that may be required for a legal hold or an investigation should be preserved. You must never conceal, cover-up, destroy, edit, falsify or mutilate any information subject to a legal hold or other preservation obligation.

1868 – The first MLIC policy.

Find Out More
- Information Lifecycle Management Global Policy
- MetLife Record Retention Schedule
Serving Our Community

In this section:

Serving Our Community
Serving Our Community

MetLife demonstrates our commitment to operating responsibly through the security we provide customers, the claims MetLife pays during times of need, our activities and investments in the communities that we serve, and MetLife’s long-term investments in the broader economy. Operating sustainably, consistent with sound environmental, social and governance principles, is at the core of our business.

Building for tomorrow includes protecting the environment and ensuring a healthy future for our employees, customers, communities, and shareholders. MetLife has a longstanding commitment to environmental stewardship, and we are proud to be the first U.S. insurer to achieve carbon neutrality.

From energy efficiency and green buildings to volunteer projects and responsible investments that benefit the environment, we work to reduce our footprint and build resiliency in a changing world. We decrease our energy use and greenhouse gas emissions through carbon reduction and operational efficiency programs, water reduction strategies, recycling and reuse efforts, and more.

We collaborate with our business partners on climate action, engage our employees in community service and environmental awareness, and make responsible investments. By pursuing our environmental goals in partnership with our employees, customers, and business partners, MetLife aims to influence meaningful change by minimizing greenhouse gas emissions and implementing more sustainable ways of working and living throughout the world.

Find Out More

- Corporate Responsibility
- MetLife Foundation

1900s – A MetLife nurse providing inoculations.
Glossary
Glossary

Anything of value
Goods, services or merchandise, such as cash, cash equivalents, gift cards, vouchers, hospitality, meals, event tickets, entertainment, travel benefits, special favors or privileges, stock options, discounts, loans, or a promise of future employment (including paid or unpaid internships).

Good faith
Good faith means that you do not have malicious intent and are not purposefully providing misleading or false information.

Government official
Includes all officials, employees (regardless of rank or level) or agents, when they are acting in an official capacity on behalf of any government entity or government-owned or controlled entity.

Legal hold
A process to preserve information that may potentially be relevant to pending or reasonably anticipated legal action, litigation, tax matters, investigations, or other matters as determined by MetLife counsel.

Material, non-public information
Information is material to particular securities, such as a company’s stock, if there is a substantial likelihood that the information would affect the market price of the securities or that a reasonable investor would consider the information important in deciding whether to buy or sell those securities. Information is non-public while it is shared in confidence or in a relationship of trust (or from someone who received it that way), and until it is both included in a broadly-disseminated communication and a sufficient time has passed for the market to “absorb” it.

MetLife
Refers to MetLife, Inc. and all of its affiliates and subsidiaries, which is any corporation, partnership, limited liability company, trust or other entity that directly, or indirectly through one or more intermediaries, is controlled by MetLife, Inc.

MetLife’s Resources
Broadly defined to include, among other things, MetLife office space, telephones (land line and cell), computer equipment, network and systems, fax machines, e-mail, MetLife business cards, MetLife letterhead, copy machines, printers, mailing lists, office supplies, and administrative support.

Non-records
Information in any physical or electronic form that does not have ongoing business or legal value or retention requirements. Examples include but are not limited to: drafts, working files, and copies of records.

Outside business activity
Any employment with or participation in a business or organization outside of your primary role at MetLife.

Personal relationship
A relationship with a family member or another person you are close to which could impair your objectivity when making business decisions.

Records
Information in any physical or electronic form that when created or received, has ongoing business or legal value and MetLife policy requires its retention. Examples include but are not limited to: customer files, complaint files, signed contracts, personnel files, and underwriting documentation.

Record Retention Schedule
An official policy document that defines standard, legally approved retention timetables and disposition instructions for records regardless of storage media.

Retaliation
Retaliation is a negative consequence or punishment imposed on an employee for engaging in a protected activity, such as raising a concern or participating in an investigation, or refusing to engage in behavior that would violate MetLife’s policies. Retaliation can be direct or indirect and is strictly prohibited.

Speak Up tool
Centralized interface for all reporting resources available to MetLife employees. The purpose of the portal is to provide employees with a safe and easy way to raise questions, issues, or concerns, and ultimately foster a speak up culture across the enterprise.

Third party
A MetLife vendor, supplier, contractor, consultant, competitor, customer organization, or external business partner.
**WHAT HAPPENS WHEN I REPORT?**

- **Contact**
  - You may raise a question, issue, or concern to any member of management or through any of the channels on the [Speak Up](#) tool.
  - Reports will be kept as confidential as possible. You may choose to raise concerns anonymously to the extent permitted by law.

- **Review**
  - Reports will typically be reviewed within 24 - 48 hours of receipt.
  - Your question, issue, or concern will be directed to the appropriate group(s) depending on the nature of the situation.

- **Investigation**
  - You may be contacted by an investigator so that more information can be gathered about your report.
  - A full investigation may take as little time as one week to several months.

- **Case Closed**
  - When possible, you will receive an update that the report was investigated and action was taken.
  - However, due to privacy concerns, you may not receive any additional information about the outcome of an investigation.

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MetLife does not tolerate retaliation in any form. If you believe you have experienced retaliation, report it immediately.