



Global Anti-Bribery and -Corruption Policy (“ABC”)

Global Program Overview for Third Parties

When MetLife business partners and third parties request information regarding the Company’s Global Anti-Bribery and -Corruption (“ABC”) program as part of their due diligence, it is important to provide them with the information necessary to recognize MetLife’s commitment to conduct business fairly, honestly, and openly and in compliance with all applicable anti-corruption laws and regulations that criminalize corrupt behavior. The following information can be used by local teams to help provide these assurances and provide an overview of MetLife’s global anti-bribery and -corruption compliance program, when requested by third parties.

Global ABC Policy and Program Overview

MetLife strictly prohibits Bribery or Corruption in business dealings in both the private and public sectors. Our Global Anti-Corruption Policy sets forth guidelines and procedures designed to mitigate Bribery and Corruption risks; promote integrity, transparency, and “doing the right thing” as an integral part of our corporate culture; and advance our reputation for trustworthiness throughout the world. MetLife recognizes the FCPA, the UK Bribery Act, and the local anti-corruption laws in each country where MetLife operates. If there are differences between this policy and local anti-corruption laws, Employees must adhere to the more stringent standard.

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 includes both MetLife Operations and any Third Party retained by MetLife. In addition, each operation is responsible for ensuring that (i) Employees are familiar with applicable anti-corruption laws; (ii) the Operation maintains a robust anti-corruption compliance program; (iii) ongoing training is provided to senior management, key operating personnel, and other employees; (iv) Employees are updated on any changes to the anti-corruption compliance program and/or regulatory requirements; and (v) risk assessments are conducted in compliance with MetLife’s Global Compliance Risk Management Policy.

The Policy also establishes global oversight of MetLife's anti-corruption compliance program. Global oversight includes (i) drafting and updating written global compliance policies and procedures; (ii) conducting country-level and regional risk assessments; (iii) developing reports for the board of directors and senior management; (iv) advising the lines of business and functional areas on corruption risks; (v) training senior management, key operating personnel, and other employees; (vi) reviewing agreements to assess anti-corruption risk; (vii) overseeing the enhanced due diligence process for potential high-risk Third Parties; (viii) developing compliance strategies in line with anti-corruption laws; (ix) performing substantive testing and face-to-face training during in-person country visits; and (x) assisting Internal Audit in its reviews of the anti-corruption compliance program.