



## Global Anti-Money Laundering Policy

### *Global Program Overview for Third Parties*

*When MetLife business partners and third parties request information regarding the Company's anti-money laundering program as part of their due diligence, it is important to provide them with the information necessary to recognize MetLife's commitment to the prevention of money laundering and terrorist financing. The following information can be used by local teams to help provide these assurances and provide an overview of MetLife's global anti-money laundering compliance program, when requested by third parties. **Please review the below information and update as necessary to incorporate any relevant aspects of your local program based on applicable law/regulation.***

### **Global AML Policy and Program Overview**

MetLife is firmly committed to complying with all applicable anti-money laundering regulations and sanctions programs. To that end, MetLife has a Global Anti-Money Laundering Policy (the "Policy") which establishes enterprise-wide principles and global minimum standards designed to facilitate compliance with all applicable anti-money laundering laws/regulations and sanctions programs as well as ensure a consistent approach to managing money laundering risk.

Under the Policy, each MetLife operation is required to build and maintain controls for the prevention of money laundering and terrorist financing and compliance with applicable sanctions programs. Based on applicable law/regulation, the Policy requires MetLife operations to take affirmative steps to mitigate money-laundering risk by: (i) maintaining Know Your Customer ("KYC") procedures that include an appropriate risk-based customer due diligence process to verify the identity of beneficial owners, obtain basic background information, as well as the source of funds and wealth, and assess the risks that the customer or account presents (ii) identifying, referring and reporting currency transactions to the appropriate regulatory authority; (iii) monitoring, investigating, and referring of suspicious activities and transactions to the Local Compliance Officer; (iv) reporting suspicious activity to the appropriate regulatory authority; (v) providing periodic AML training to appropriate personnel on AML, local sanctions programs, and other applicable laws, regulations, policies and procedures; (vi); and the screening of all customers, employees, third parties and payees in compliance with locally applicable sanctions programs.

The Policy also establishes an internal AML governance structure to manage global money-laundering and sanctions risk, and establishes consistent enterprise-wide standards on: (i) the appointment of AML officers; (ii) the performance of risk assessments for each operation; (iii) the screening of all customers, employees, third parties and payees for compliance with OFAC sanctions programs; and (vii) employee training, including ongoing risk-based training.