



MetLife's Code of Business Ethics



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Our Leadership

The anchor for everything we do is our purpose: **Always with you, building a more confident future.** Our purpose guides us in providing financial protection and support to our customers during life's most destabilizing moments.

MetLife's Code of Business Ethics helps us live our purpose with every customer, every day. It helps us navigate an always-changing external environment while meeting the highest professional standards.

Each of us is an ambassador for MetLife, and each of us contributes to the Company's reputation. 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 years; however, a constant has been the quality of our people and their commitment to our purpose. Thanks for doing your part to build on this legacy.

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.



1900s – A visiting nurse in a family's home.

Metropolitan Life Insurance Company (MetLife or the Company) 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.

1906 – MetLife policyholders after the San Francisco Earthquake.

Our Success Principles

MetLife’s Code of Business Ethics is the foundation for our Success Principles and represents our core beliefs for conducting business. Our Success Principles articulate the behaviors that MetLife employees are expected to exhibit, guide our actions, and help us to deliver on our purpose.



Find Out More

- [Success Principles](#)
- [Our Purpose](#)

MetLife Success Principles



We drive change and innovation

- **Seize opportunity**
Drive responsible growth and identify areas for continuous improvement
- **Experiment with confidence**
Courageously learn and test new ideas without fear of failure
- **Act with urgency**
Demonstrate speed to action with agility and determination



We collaborate and empower each other to succeed

- **Seek diverse perspectives**
Source ideas and feedback to expand thinking and make informed decisions
- **Champion inclusion**
Foster an environment where everyone is valued, heard and can speak up
- **Create alignment**
Partner with others across the organization with candor and transparency



We deliver for our customers

- **Take responsibility**
Be accountable and act in pursuit of the right outcomes
- **Enable solutions**
Anticipate and address obstacles while managing risk
- **Deliver what matters**
Execute meaningful priorities and follow through on commitments





Owning Our Code

In this section:

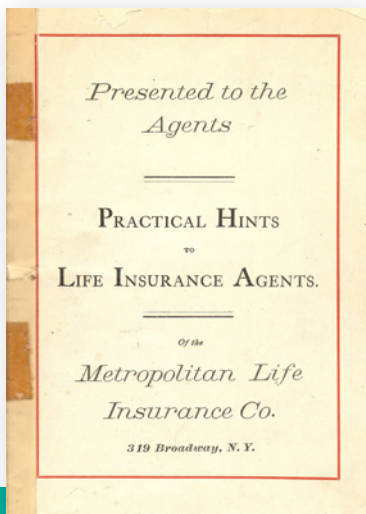
Know Your Responsibilities

Make Ethical Decisions

Know Your Responsibilities
as a Manager

Know Your Responsibilities

MetLife's legacy endures through its employees. Caring for people is fundamental to 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 our Success Principles.



1914 – A publication distributed to agents outlining their duties and responsibilities.

Our Code of Business Ethics (Code), together with Company policies, gives you the information you need to perform your job ethically and in line with MetLife's standards, and applicable 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 workplace culture and reputation.
- Collaborate and communicate among different groups in the Company.
- 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 Attestation.
- 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.

Find Out More

- [Global Policies](#)
- [Global Ethics Site](#)
- [Supplier Code of Business Ethics](#)

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.

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 principles, 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.



Manager Tip!

You are responsible for fostering an inclusive and diverse work environment that attracts and retains the best employees and encourages your team to collaborate and experiment with confidence. Here are some examples of ways you can do this:

- Cultivate an environment where everyone feels that they belong, and their contributions are valued.
- Seek diverse perspectives in team meetings so employees share different points of view.
- Create opportunities for your team members to work with others across the company with candor and transparency.
- Remind employees of the importance of treating each other with respect.





Make Ethical Decisions

At MetLife, we strive to do what is right for our employees, 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.

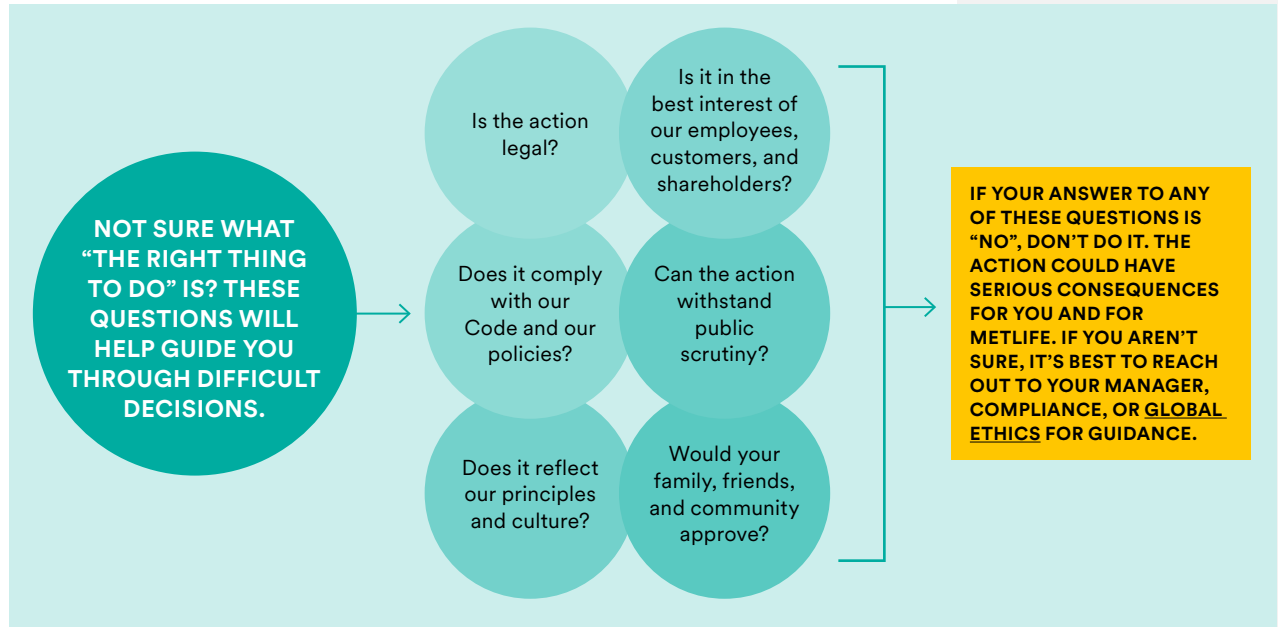
You are not alone. MetLife’s Code and Success Principles are here to guide you in making ethical decisions.

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 employees, customers, shareholders, 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?



Can I use my MetLife WebEx account to host a virtual gathering for my family?

While this may seem harmless, utilizing MetLife applications for personal use may have unintended consequences or carry unforeseen risks. MetLife applications should only be used for their intended business purposes unless authorized by senior management.



Caring for Our People

In this section:

Champion Diversity, Equity, and Inclusion

Respect Others

Promote a Safe and Secure Workplace

Speak Up!

What Happens When I Report?

Do Not Tolerate Retaliation



Champion Diversity, Equity, and Inclusion



At MetLife, we have a longstanding commitment to diversity, equity, and inclusion (DEI) that enables us to create opportunities for employees, meet customers’ needs and expectations, deliver value to shareholders, and make a positive impact on society. DEI is an essential component of our Success Principles, which drive us to champion inclusion, seek diverse perspectives, and create alignment. In order for us to win together, we must collaborate and empower each other to succeed.

embrace different points of view and welcome change contributes to a diverse and collaborative place to work. **It is incumbent on every employee to value our differences and nurture our culture of respect.**

At MetLife, we focus on attracting, developing, and retaining employees with diverse skills, talents, backgrounds, and experiences and provide equal employment and advancement opportunities for all individuals working or seeking employment. Our efforts are reflected in the policies, programs, and practices we implement to build a workforce that works for all.

1877 – Carrie Foster, our first female associate.



We are committed to cultivating a purpose-driven and inclusive workplace culture where employees are energized to make a difference and feel respected, recognized, valued, and motivated each day. This culture encourages us to listen and respond to one another’s ideas and needs, and provide support to help one another achieve success. Our openness and courage to

Diversity means leveraging and developing the unique attributes and perspectives of our employees, but we know that representation is not enough; we must ensure that our employees experience equity, everyone receives the support they need and equal access to opportunities in the workplace.



Find Out More

- [Global Diversity and Inclusion](#)
- [Equal Employment Opportunity and Anti-Harassment Policy \(US only\)](#)



Respect Others

We demonstrate our commitment to inclusion and collaboration by acting professionally and treating one another with respect. 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 bullying, 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.

Our Commitment to Human Rights

MetLife’s commitment to promoting a culture of respect goes beyond our policies prohibiting discrimination and harassment in the workplace. As a UN Global Compact signatory and participant, MetLife also encourages respect for human rights globally, both in the workplace and in the community, by prioritizing compliance with policies and regulations designed to prevent any abuses of human rights such as human trafficking or slavery, forced labor, and child labor; providing safe and healthy working conditions, and supporting programs and initiatives that protect the economic livelihood of local communities.

It is MetLife’s policy to comply with all applicable employment and labor laws and we are committed to providing a diverse and inclusive work environment, free of all forms of unlawful harassment and discrimination. We value individual differences and do not tolerate 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.

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, 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.



Find Out More

- [Global Workplace Statement](#)
- [Human Rights Statement](#)

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.



Find Out More

- [Safe and Secure Workplace Policy \(US Only\)](#)



- 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 principles 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 address an issue and make improvements.
- If the appropriate people don't know something is wrong, they cannot take corrective action.
- 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. Your manager is an excellent resource and may be 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](#)
- [Corporate Special Investigations Unit](#)
- Or reach out to Local or Regional:
 - Compliance
 - Helpline or Whistleblowing Contact
 - Human Resources or Employee Relations

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](#)



Speak Up



What Happens When I Report?

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.

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.



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.

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.

METLIFE DOES NOT TOLERATE RETALIATION IN ANY FORM. IF YOU BELIEVE YOU HAVE EXPERIENCED RETALIATION, REPORT IT IMMEDIATELY.

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.

What Is Retaliation?

Retaliation is targeting or treating employees less favorably because they engaged in 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.

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 do not engage in them. Tell your employees that they can come to you if they suspect that they or someone else is being retaliated against, and that their concern will be handled appropriately and as confidentially as possible.

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:

- Demoting or terminating an employee without a legitimate business reason.
- Providing an unjustified or unsupported negative performance review.
- Restricting or reducing compensation without a legitimate business reason.
- Denying eligible employee benefits or training opportunities provided to all others.
- Speaking in a disrespectful or unreasonably harsh manner, or acting in ways that intentionally embarrass an employee.

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

- Assigning an employee an unpopular job or arbitrarily increasing or decreasing their workload without a legitimate business reason.
- Issuing disciplinary action to an employee for performance issues or behavior that other employees who engaged in the same conduct have not been disciplined for.
- Withholding information or excluding an employee from meetings, events, or discussions that they should participate in.
- Intentionally failing to recognize an employee for work well done.
- Setting unrealistic deadlines to cause an employee to fail.

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.

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

Comply with Sanctions

Prevent Money Laundering

Comply with Government
Relations Policies

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.

We have a commitment to MetLife, our customers, shareholders, and each other to act with integrity and hold ourselves accountable. Each year all MetLife employees are required to complete a questionnaire to identify any actual, perceived, or 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. The information in your questionnaire must always be accurate and up to date. By providing this information, you are protecting MetLife, our customers, shareholders, yourself, and your colleagues by allowing MetLife to mitigate any harm that may result from a conflict, including loss of trust, loss of credibility, or damage to MetLife's reputation.

It's important to understand that a conflict of interest may still exist even if nothing unethical or improper occurs.

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.

If you are in doubt about whether to disclose an [outside business activity](#), [personal relationship](#), financial interest, or other situation, seek guidance from your manager, a senior manager in your line of business, or [Global Ethics](#).

Generally, it is best to provide all relevant information on your questionnaire to enable an assessment to be made based upon the specific facts and circumstances.

What If?

What if I need to make a change or update my questionnaire and the time for the annual Conflict of Interest Disclosure Program has passed?

If a possible conflict of interest arises or you need to make a change to the information in your questionnaire, speak to your manager and then update your questionnaire by visiting the [Conflict of Interest Disclosure Tool](#). Select "Show Disclosures Available to Update" from the Home screen. For guidance, visit the [Global Ethics Site](#).

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 questionnaire within the required time frame.
- Review all affirmative responses submitted by your employees on their conflict of interest questionnaires within the required time frame.
- 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.



Find Out More

- [Global Ethics Site](#)
- [Board Memberships, Nonprofits, and Volunteer Activities](#)

1901 – The employees of the Pacific Coast head office.





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.



Find Out More

- [Stakeholder Engagement Policies](#)
- [Social Media Policy](#)
- [Internal Social Policy](#)

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.



Internal communications are as important as external ones. You are required to comply with our Code, our Internal Social Policy, and all applicable 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 governing laws require 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 and be responsive to their needs.
- 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.



Find Out More

- [MetLife’s Global Sales Practices Policy](#)





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.

You may not offer or accept gifts and/or entertainment to influence a decision or obtain an improper advantage in business.

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.

You may give and receive appropriate, lawful business gifts and entertainment in connection with your work, provided that the gifts and entertainment are reasonable in value, appropriate for the occasion, and be given openly and transparently so that no appearance of impropriety exists. Gifts and entertainment must be incidental to genuine, necessary business relationships, but under no circumstances may any gift or entertainment be given in exchange for favorable treatment to MetLife. Prior to giving or accepting business 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.

You may not offer or accept gifts and/or entertainment to influence a decision or obtain an improper advantage in business. 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.

In the course of business, you are prohibited from giving or accepting anything of value (e.g. a gift) if it is:

- Extravagant or expensive
- Cash or cash equivalents (such as gift cards), except where local policies permit small amounts for cultural holiday exchanges
- Anything prohibited by governing 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



Find Out More

- [Global Anti-Corruption Policy](#)

Comply with Sanctions

Governing laws and regulations prohibit providing direct or indirect services or to otherwise deal with sanctioned individuals, entities, countries, or governments. MetLife's Sanctions compliance policies and procedures are designed to comply with local economic sanctions regulations.

Sanctioned parties are generally identified on sanctions watchlists, as part of an embargo involving a specific country, or as included within a particular business sector. Sanctions screening and general awareness of sanctioned country warning signs are critical to protecting MetLife from economic sanctions risk. You have a responsibility to know and comply with the policies and procedures that apply to you and your department. If you encounter a sanctions warning sign, escalate to your manager and Compliance and wait for instruction or guidance before proceeding.



Find Out More

- [Global Anti-Money Laundering Policy](#)
- [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 derived from illegal activity into the financial system.
- “Layering” the assets by moving them between multiple accounts or financial institutions.
- Integrating the assets back into the mainstream economy (e.g., purchasing a house).

To prevent money laundering, we must be watchful for warning signs 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.

If you even suspect bribery, corruption, money laundering, or a potential sanctions violation, report it to the appropriate channels immediately. If you have questions, contact [Anti-Financial Crimes Compliance](#).



Comply with Government Relations Policies

Employees may participate in political and government related activities during their personal time.

However, you must not use company time, funds, or property in support of any political party, organization or committee, candidate for public office or ballot issue, unless permitted by law and approved in advance by your local [Government Relations Contact](#). If you want to hold public office or support a political candidate, party or committee, you should do so only in a personal capacity, on your own time and without use of any MetLife resources.

What If?



I want to hold a position with my local government. What do I need to do?

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.

Contact [Global Government Relations](#) prior to pursuing these roles.

Interacting with Government Officials

You must take care when interacting with [government officials](#). Pre-approval and other requirements may apply when providing [anything of value](#), directly or indirectly, to a government official on behalf of MetLife. Depending on governing laws and regulations, this may include personal political contributions. Before taking action of any kind, check your local policies and guidelines.

Employees must obtain senior management approval prior to promoting an outside charitable organization in the workplace or using [MetLife resources](#) in connection with a charitable organization that involves government and/or elected officials, their spouses, or candidates for public office. Refer to MetLife's Employee Interaction with Public Officials and Employees and the Global Anti-Corruption Policy for more information.

Engaging with government officials may subject MetLife and/or its employees to regulatory disclosure and other requirements. Contact Global Government Relations prior to engaging in the following activities if it is in connection with your role at MetLife or in support of MetLife's business:

- Contacting a government or public official or retaining a third party to do so on our behalf
- Joining any association or professional organization that engages with government officials



Find Out More

- [Employee Interaction with Public Officials and Employees](#)
- [Stakeholder Engagement Policies](#)
- [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.

If you have questions related to competition laws, contact PublicCompany.law@metlife.com.

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.



Find Out More

- [Antitrust Guidelines](#)



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 customers, 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.

1868 – Introducing MLIC to the world.



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 newsworthy information such as 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. If you have questions related to material non-public information, contact PublicCompany.law@metlife.com.

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.



Find Out More

- [MetLife’s Insider Trading Policy](#)

Protecting Our Assets

In this section:

Use Data Responsibly

Maintain Accurate Records

Protect our Personal Information

Safeguard Our Assets



Use Data Responsibly

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 accountable for understanding the type of data you work with and the purposes it should be used for, as well as managing potential risks and liabilities. All data that you work with must be handled responsibly to ensure its integrity, protect individuals' privacy, and build trust. Our Data Governance Policy provides guidance to assure data is available, usable, of high quality, and secure. Treat the data of our customers, employees, and third parties responsibly.



Find Out More

- [MetLife Data Governance Policy](#)





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, directly or indirectly, 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 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.

All MetLife employees are required to prevent, identify, and report 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 "data breach" as defined by applicable privacy laws. It's important that you report any suspected personal data incidents to your manager and through the [Speak Up tool](#) or appropriate local channel. MetLife determines if a data breach occurred based on applicable privacy laws and notifies regulator(s) and/or individual(s) as required.

Examples of personal data incidents include, but are not limited to:

- Emailing or mailing documents with personal information to the wrong recipient.
- Emailing personal information to your personal non-MetLife email address.
- Posting personal information to an unsecured shared site.
- Losing a company laptop, phone or other device.

Privacy requirements:

- 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 any applicable consent or authorization.
- Comply with MetLife's clean desk and information destruction requirements.
- Send emails that contain personal information in a secure manner (e.g., using encryption) to recipients outside of the Company.
- 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.

What If?



I want to finish this work project on my personal home computer. Can I send the files I need to my personal email address?

Do not send files containing personal information to any personal email address (including your own). It is a violation of MetLife's IT Policies and Standards to send personal information held by MetLife to a personal email address and to perform work on a personal computer rather than a MetLife-issued device. Only use your MetLife email to send and receive files containing personal information.



Find Out More

- [Global Privacy Policy](#)

If you have questions regarding privacy and appropriate use of personal information, please reach out to Compliance or the Law Department.



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. You 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.

1868 –The leather box that held the company assets.



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 have created intellectual property related to your employment while an employee of MetLife, then 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.

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.



Find Out More

- [Information Security Policy](#)
- [Security Awareness Site](#)



Maintain Accurate Records

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.



Find Out More

- [Financial Management Code of Business Ethics](#)

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?

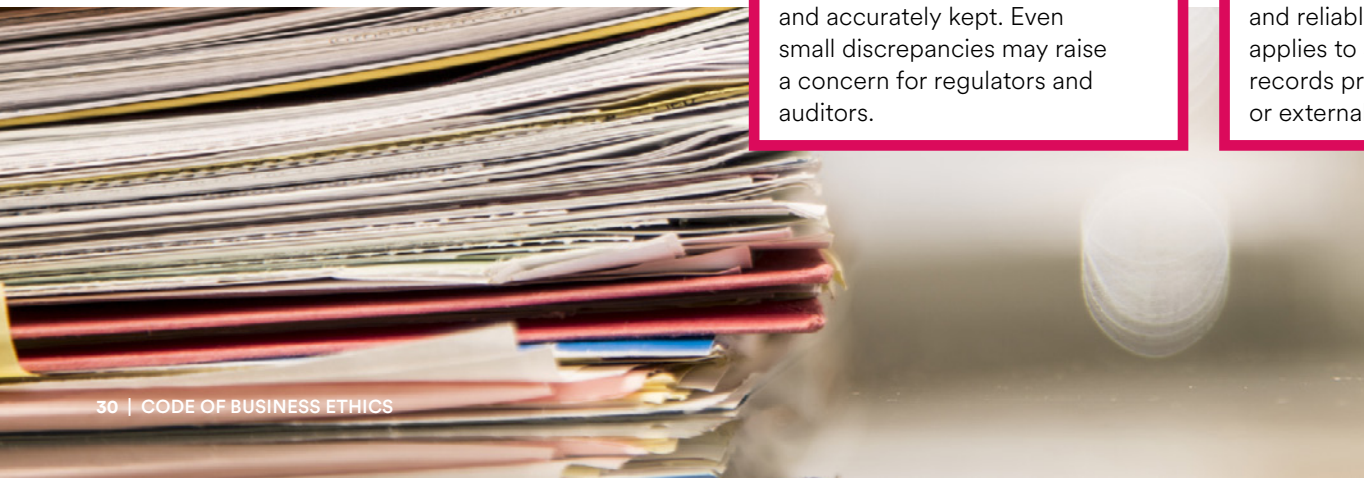
Yes, because MetLife is a financial services company, all records must be above reproach and accurately kept. Even small discrepancies may raise a concern for regulators and auditors.

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.

Wanted J. A. M. - see call to day.

No Acc't Rob 1 to 3

46.50
14
747.34
23.60%

Metropolitan
LIFE INSURANCE COMPANY,
OFFICE, No. 243 BROADWAY, NEW YORK.

Life of <i>Henry K. Pashley</i>	No. <i>582</i>	Date <i>March 25</i>	IS <i>68</i>
Term <i>Life</i>	Amount \$ <i>500.00</i>	Age <i>22</i>	Premium <i>92.50</i>
Amount of Loan <i>46.</i>	Interest <i>2.76</i>	Payments <i>Semi-Annual</i>	<i>23.67</i>

These blanks are not to be filled by Agents.

1. NAME OF THE PERSON for whose benefit the Insurance is applied for. What is his relationship to you? <i>Wife</i>	RESIDENCE. <i>Williamsville</i>		
2. NAME, AT FULL LENGTH, of party whose Life is proposed for insurance. <i>Henry K. Pashley</i>	OCCUPATION. <i>Bookkeeper</i>	RESIDENCE. Place. <i>W.burgh</i> County. <i>Richd</i> State. <i>N.Y.</i>	PLACE OF BUSINESS.
3. A—Is your LIFE now insured? B—If so, in what Company or Companies, for what amount, and in what year? C—Has any Life Insurance Company declined granting a Policy on your Life?	A. <i>no</i> B. <i>—</i> C. <i>no</i>		
4. STATE THE PLACE and date of your birth.	PLACE OF BIRTH. <i>N.Y. State</i>	YEAR. <i>1846</i>	MONTH. DAY. <i>aug 10</i>
5. WHAT IS YOUR AGE at nearest birthday?	<i>22</i>	B. Are you married?	<i>married</i>
6. A—SUM TO BE INSURED. B—What kind of Policy is now applied for?	A. <i>500</i> B. <i>Life</i>		
7. Is the PREMIUM to be paid annually, semi-annually, thrice-annually, or quarterly; whether with or without participation in Profits; and do you wish a loan of one-third?	Annually.	Semi-Annually.	Thrice-Annually. Quarter-Annually. Loan. With Profits.
8. A—HAVE YOU BEEN vaccinated or had the Small Pox? B—HAVE YOU had Yellow Fever?	A. <i>yes</i> B. <i>no</i>		
9. HAVE YOU RESIDED out of the United States, or in Southern or Western States; if so, where, how long, and for what purpose (business, pleasure or health)?	<i>no</i>		
10. HAVE YOU EVER had Dropsy, Paralysis, Consumption, Spitting of Blood, Scrofula, Gout, Rheumatism, Fits, Liver Complaint, or been subject to Cough, Dyspepsia, Dysentery, Bilious Colic or Diarrhoea?	<i>no</i>		
11. HAVE YOU HAD during the last seven years, any sickness or disease; if so, of what nature; how long since, and what Physician was consulted?	<i>no</i>		
12. WHAT IS the present state of your health?	<i>yes</i>		
13. A—ARE YOUR HABITS of life correct and temperate? B—Have they always been so?	A. <i>yes</i> B. <i>yes</i>		

FATHER? Age if Living? State of Health? Age at Death? Cause of Death?

General Agent at

X. B.—Agents are particularly requested to see that all names and

Find Out More

- Information Lifecycle Management Global Policy
- MetLife Record Retention Schedule



Operating Sustainably

In this section:

Create a Positive Impact

Protect the Environment

Serve Our Communities

Create a Positive Impact

MetLife focuses on creating a positive impact for customers, employees, shareholders, communities, and the environment, by aligning the Company's sustainability objectives with its purpose and business mission. Operating sustainably, consistent with sound environmental, social and governance principles, is at the core of our business.

Our approach to sustainability is aligned with the United Nations Sustainable Development Goals (SDGs) to contribute toward meaningful change around the world. While we support all of the SDGs, we have prioritized four goals in particular, given their relevance to our business: good health and well-being, decent work and economic growth, reduced inequalities, and climate action.

In 2020, we became the first U.S.-based insurer to join the United Nations Global Compact (UNGC), the world's largest corporate sustainability initiative, which calls for companies to align their operations and strategies with ten universal principles in the areas of human rights, labor, the environment, and anti-corruption. We will continue to use these principles as important guides to focus our work.

Protect the Environment

Building for tomorrow includes protecting the environment and ensuring a healthy future for our employees, customers, communities, and shareholders. 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.

We are proud to be the first U.S. insurer to achieve carbon neutrality and we continue to make great strides across our priorities, including launching our 2030 environmental goals. As one of the largest financial services companies in the world, we recognize that there is much more we can do to address climate change and protect our environment, and we will continue to seek additional ways to reduce our footprint and build resiliency in a rapidly changing world.



Find Out More

- [Sustainability at MetLife](#)
- [MetLife Foundation](#)
- [2030 Environmental Goals](#)
- [United Nations Global Compact \(UNGC\)](#)

Serve Our Communities

MetLife's focus on financial health throughout life, from childhood to retirement, is an integral part of our business strategy, and how we create value for people—through our investing, our employees' passion and volunteerism, and the efforts of MetLife Foundation. MetLife Foundation partners with nonprofit organizations and social enterprises to create financial health solutions and build stronger communities, while engaging MetLife employee volunteers to help drive impact. MetLife employees help raise money to support local causes, dedicate time and talent, and provide pro bono support to social sector organizations through counseling, virtual sessions, and more.

1900s – A MetLife nurse providing inoculations.





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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 resources

Broadly defined to include, among other things, MetLife intellectual property, 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, participation, or interest 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.

Protected personal characteristic

A personal characteristic that is protected from harassment/discrimination by law. Examples include age and gender.

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 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 via which all reporting resources available across the enterprise can be accessed by 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.

