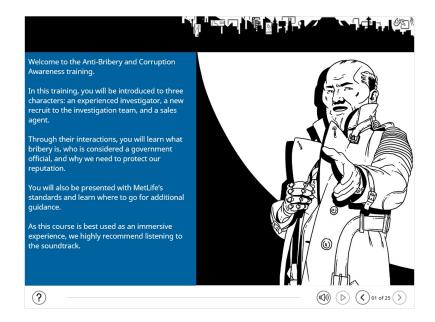


Anti-Bribery and Corruption Awareness



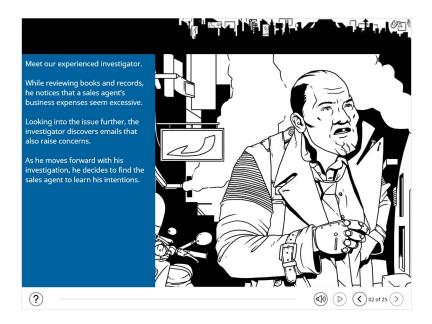
Welcome to the Anti-Bribery and Corruption Awareness training.

In this training, you will be introduced to three characters: an experienced investigator, a new recruit to the investigation team, and a sales agent.

Through their interactions, you will learn what bribery is, who is considered a government official, and why we need to protect our reputation.

You will also be presented with MetLife's standards and learn where to go for additional guidance.

As this course is best used as an immersive experience, we highly recommend listening to the soundtrack.

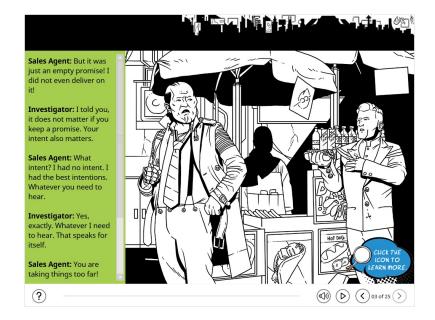


Meet our experienced investigator.

While reviewing books and records, he notices that a sales agent's business expenses seem excessive.

Looking into the issue further, the investigator discovers emails that also raise concerns.

As he moves forward with his investigation, he decides to find the sales agent to learn his intentions.



Sales Agent: But it was just an empty promise! I did not even deliver on it!

Investigator: I told you, it does not matter if you keep a promise. Your intent also matters.

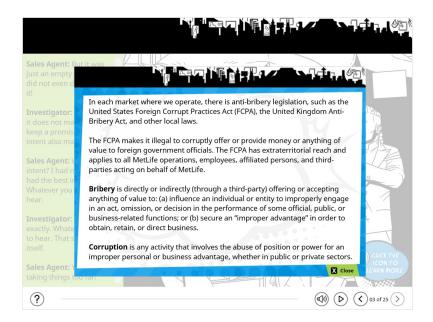
Sales Agent: What intent? I had no intent. I had the best intentions. Whatever you need to hear.

Investigator: Yes, exactly. Whatever I need to hear. That speaks for itself.

Sales Agent: You are taking things too far! How can it be a bribe when I did not give anyone anything?

Investigator: You promised to employ the clerk's son. That is what the email said.

Click the icon to learn more.

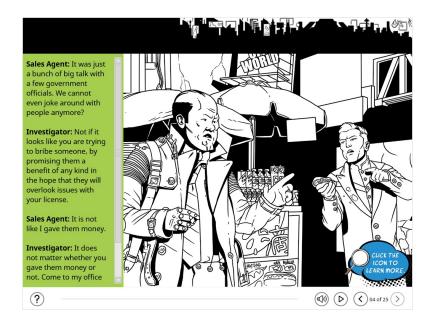


In each market where we operate, there is anti-bribery legislation, such as the United States Foreign Corrupt Practices Act (FCPA), the United Kingdom Anti-Bribery Act, and other local laws.

The FCPA makes it illegal to corruptly offer or provide money or anything of value to foreign government officials. The FCPA has extraterritorial reach and applies to all MetLife operations, employees, affiliated persons, and third-parties acting on behalf of MetLife.

Bribery is directly or indirectly (through a third-party) offering or accepting anything of value to: (a) influence an individual or entity to improperly engage in an act, omission, or decision in the performance of some official, public, or business-related functions; or (b) secure an "improper advantage" in order to obtain, retain, or direct business.

Corruption is any activity that involves the abuse of position or power for an improper personal or business advantage, whether in public or private sectors.



Sales Agent: It was just a bunch of big talk with a few government officials. We cannot even joke around with people anymore?

Investigator: Not if it looks like you are trying to bribe someone, by promising them a benefit of any kind in the hope that they will overlook issues with your license.

Sales Agent: It is not like I gave them money.

Investigator: It does not matter whether you gave them money or not. Come to my office tomorrow, so we can discuss this further, please.

Click the icon to learn more.



Who is a government official?

Government officials include 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.

Examples:

- Any person, whether elected or appointed, acting in an official capacity for, or on behalf
 of, any national, state, local or municipal government, government entity or public
 international organization.
- An employee of government-owned and government-controlled banks (or other state-owned entities).
- Insurance regulators and inspectors.

What is a controlled entity?

An entity controlled by the government where (i) the government owns more than 50% of the entity; or (ii) the government exercises control over the entity.

Important: While not prohibited, engaging with a government entity or government official as a customer, vendor, third-party, candidate, etc., increases the risk level and should be escalated for review. MetLife is liable if third-parties offer or accept bribes while performing services for MetLife. As a result, third-parties are strictly prohibited from engaging in bribery or other corrupt activity when acting on behalf of MetLife. These third-parties include our service providers, vendors, sales agents, brokers, and intermediaries.



Next on our investigator's schedule is a meeting with a new recruit, who recently joined his investigation team.



Investigator: Pleasure to meet you. Welcome to the team.

Recruit: The pleasure is all mine. Your reputation precedes you. I have always wanted to work for an investigator like you.

Investigator: Well, thank you. After all, a good reputation is very valuable and worth protecting.

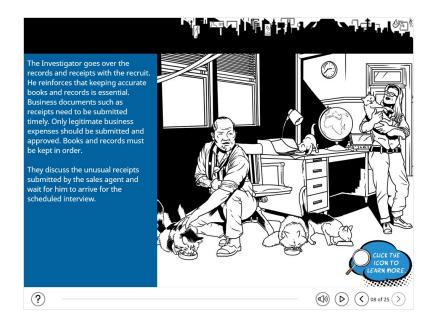
Tell me a bit about yourself.



Recruit: I recently graduated from the Anti-Bribery Academy and I am ready to catch criminals.

Investigator: It might be some time before we get to any "criminal catching." We will start by having you join me on an interview tomorrow. You can show me what they taught you at the Academy, and we can go from there.

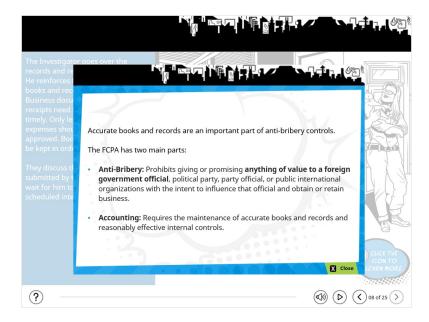
Recruit: Sounds good!



The Investigator goes over the records and receipts with the recruit. He reinforces that keeping accurate books and records is essential. Business documents such as receipts need to be submitted timely. Only legitimate business expenses should be submitted and approved. Books and records must be kept in order.

They discuss the unusual receipts submitted by the sales agent and wait for him to arrive for the scheduled interview.

Click the icon to learn more.



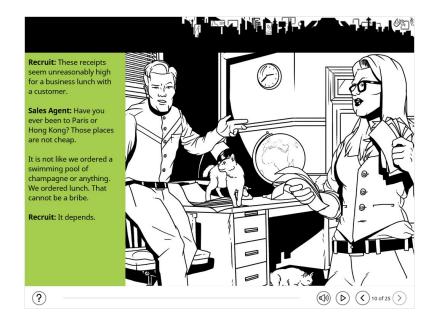
Accurate books and records are an important part of anti-bribery controls.

The FCPA has two main parts:

- Anti-Bribery: Prohibits giving or promising anything of value to a foreign government official, political party, party official, or public international organizations with the intent to influence that official and obtain or retain business.
- **Accounting:** Requires the maintenance of accurate books and records and reasonably effective internal controls.



Investigator: I have copies of the records that seem unusual. My associate will review these with you and ask you some questions.



Recruit: These receipts seem unreasonably high for a business lunch with a customer.

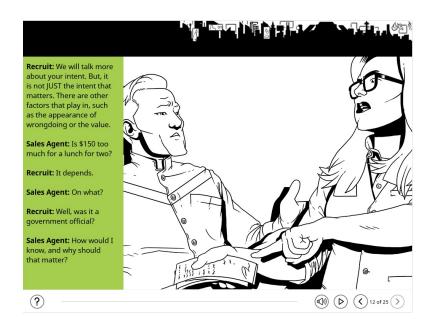
Sales Agent: Have you ever been to Paris or Hong Kong? Those places are not cheap.

It is not like we ordered a swimming pool of champagne or anything. We ordered lunch. That cannot be a bribe.

Recruit: It depends.



Sales Agent: Let me guess. It is about my intent, right? I already told you yesterday that I had no intent. Or whatever.



Recruit: We will talk more about your intent. But, it is not JUST the intent that matters. There are other factors that play in, such as the appearance of wrongdoing or the value.

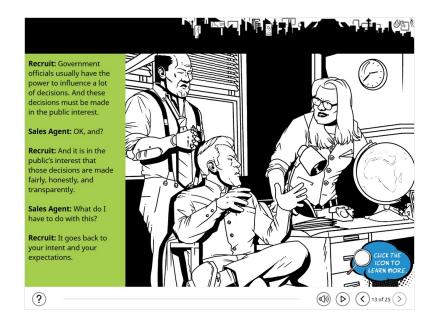
Sales Agent: Is \$150 too much for a lunch for two?

Recruit: It depends.

Sales Agent: On what?

Recruit: Well, was it a government official?

Sales Agent: How would I know, and why should that matter?



Recruit: Government officials usually have the power to influence a lot of decisions. And these decisions must be made in the public interest.

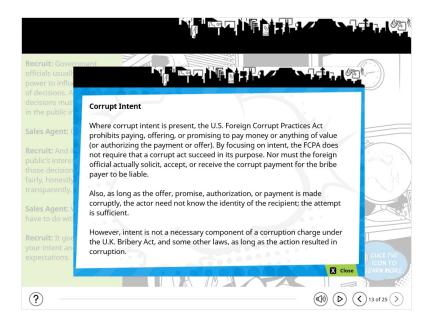
Sales Agent: OK, and?

Recruit: And it is in the public's interest that those decisions are made fairly, honestly, and transparently.

Sales Agent: What do I have to do with this?

Recruit: It goes back to your intent and your expectations.

Click the icon to learn more.

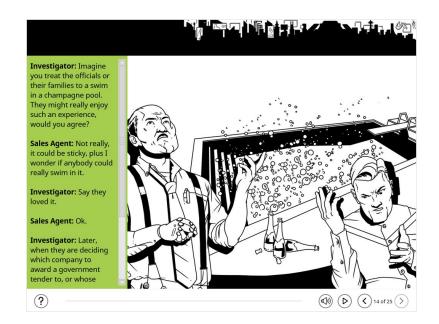


Corrupt Intent

Where corrupt intent is present, the U.S. Foreign Corrupt Practices Act prohibits paying, offering, or promising to pay money or anything of value (or authorizing the payment or offer). By focusing on intent, the FCPA does not require that a corrupt act succeed in its purpose. Nor must the foreign official actually solicit, accept, or receive the corrupt payment for the bribe payer to be liable.

Also, as long as the offer, promise, authorization, or payment is made corruptly, the actor need not know the identity of the recipient; the attempt is sufficient.

However, intent is not a necessary component of a corruption charge under the U.K. Bribery Act, and some other laws, as long as the action resulted in corruption.



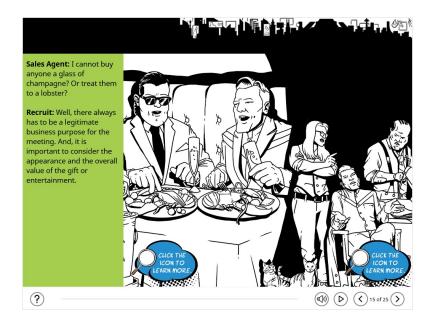
Investigator: Imagine you treat the officials or their families to a swim in a champagne pool. They might really enjoy such an experience, would you agree?

Sales Agent: Not really, it could be sticky, plus I wonder if anybody could really swim in it.

Investigator: Say they loved it.

Sales Agent: Ok.

Investigator: Later, when they are deciding which company to award a government tender to, or whose company to go easy on during an investigation, they could say, "Hey, those champagne pool-filling people took good care of me and my family, I will take good care of them now."



Sales Agent: I cannot buy anyone a glass of champagne? Or treat them to a lobster?

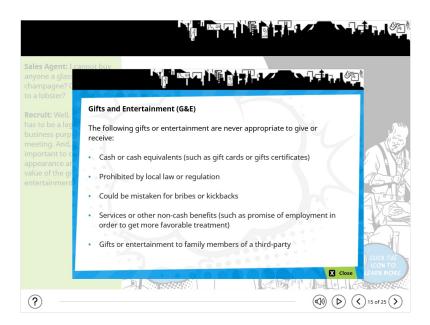
Recruit: Well, there always has to be a legitimate business purpose for the meeting. And, it is important to consider the appearance and the overall value of the gift or entertainment.

Click the icon to learn more.



Bona Fide Expenditures

Reasonable and Bona Fide Expenditures are generally permitted if they are directly related to the promotion, demonstration, or explanation of the Company's products or services, or are related to the Company's execution or performance of a contract with a foreign government or agency. Trips that are primarily for personal entertainment purposes, however, are not bona fide business expenses and may violate the FCPA's anti-bribery provisions.



Gifts and Entertainment (G&E)

The following gifts or entertainment are never appropriate to give or receive:

- Cash or cash equivalents (such as gift cards or gifts certificates)
- Prohibited by local law or regulation
- Could be mistaken for bribes or kickbacks
- Services or other non-cash benefits (such as promise of employment in order to get more favorable treatment)
- Gifts or entertainment to family members of a third-party

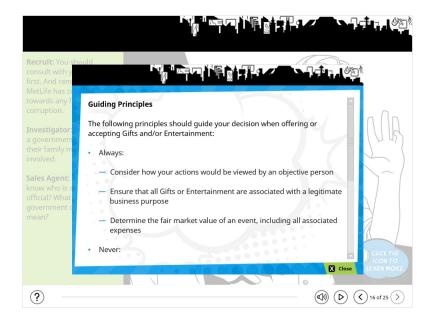


Recruit: You should consult with your manager first. And remember, that MetLife has zero tolerance towards any form of corruption.

Investigator: Especially if a government official or their family member is involved.

Sales Agent: And how do I know who is a government official? What does government official even mean?

Click the icon to learn more.



Guiding Principles

The following principles should guide your decision when offering or accepting Gifts and/or Entertainment:

- Always:
 - Consider how your actions would be viewed by an objective person
 - Ensure that all Gifts or Entertainment are associated with a legitimate business purpose
 - Determine the fair market value of an event, including all associated expenses
- Never:
 - Offer or accept Gifts or Entertainment that appear lavish, improper, or potentially offensive
 - Offer or accept cash or cash equivalents, including gifts cards
 - Offer or accept Gifts or Entertainment to influence a decision or retain business
 - Offer or accept Gifts or Entertainment during a bidding process or contract negotiation
 - Request Gifts or Entertainment under any circumstances

Important: Gifts or Entertainment must be reasonable in value, customary and legal in the market where exchanged!



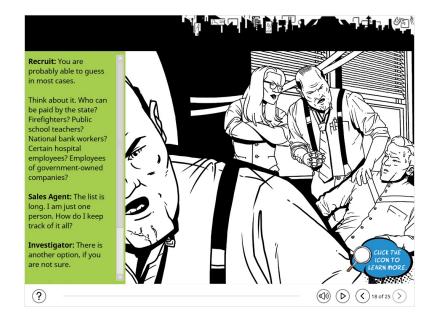
Recruit: It could mean a lot of things.

Appointed officials, elected officials, government representatives, or regulators.

People who work in the public sector. Another way to look at it is—anybody whose salary is partially or wholly provided by the government.

Sales Agent: How would I know that? Do I need to hire detectives to find out?

Recruit: You can always raise your question or concern with your Manager.



Recruit: You are probably able to guess in most cases.

Think about it. Who can be paid by the state? Firefighters? Public school teachers? National bank workers? Certain hospital employees? Employees of government-owned companies?

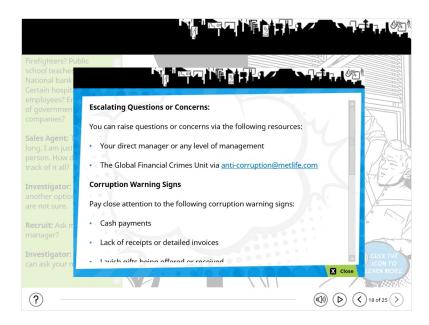
Sales Agent: The list is long. I am just one person. How do I keep track of it all?

Investigator: There is another option, if you are not sure.

Recruit: Ask my manager?

Investigator: Yes, you can ask your manager.

Click the icon to learn more.



Escalating Questions or Concerns:

You can raise questions or concerns via the following resources:

- Your direct manager or any level of management
- The Global Financial Crimes Unit via <u>anti-corruption@metlife.com</u>

Corruption Warning Signs

Pay close attention to the following corruption warning signs:

- Cash payments
- Lack of receipts or detailed invoices
- Lavish gifts being offered or received
- Services not actually provided by the third-party
- Excessive commission payments, or payments that exceed local norms
- Third-party:
 - Was hired at the request of a government official
 - Lacks the skills to provide the necessary services
 - Does not have a real office or staff
 - Refuses to provide due diligence information
- Request for an unusual or substantial upfront payment or bonus
- Contract does **not** clearly define the services to be performed



Investigator: Think about it this way: If you had asked your manager whether you can promise someone a job, they would have said "no" since it certainly seems to be done with

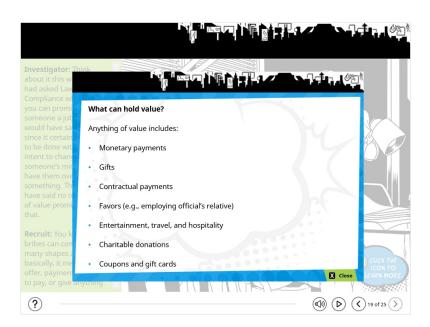
the intent to change someone's mind and have them overlook something. They would have said no to anything of value promised like that.

Recruit: You know, bribes can come in many shapes and sizes; basically, it means an offer, payment, promise to pay, or give anything of value in exchange for an unfair benefit.

Sales Agent: What does "anything of value" even mean?

Recruit: Whatever has the power to change someone's mind or is an advantage or benefit to the recipient. It could be an improper job offer, a lavish trip or gift, tickets to an exclusive sporting event. It does not even have to be something expensive. Even a small gift is an issue if it is intended to influence a decision or action by the person who receives it, or if it could be perceived that way. I am not talking about a cab fare or a regular meal here. Small items like that are OK, as long as they are permitted under local laws and not for an improper purpose.

Click the icon to learn more.

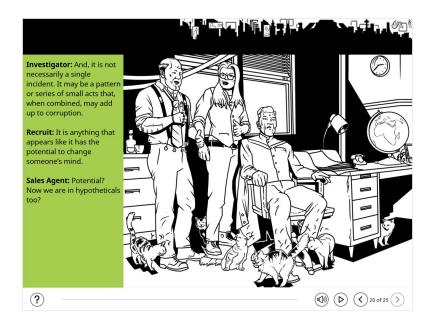


What can hold value?

Anything of value includes:

- Monetary payments
- Gifts
- Contractual payments

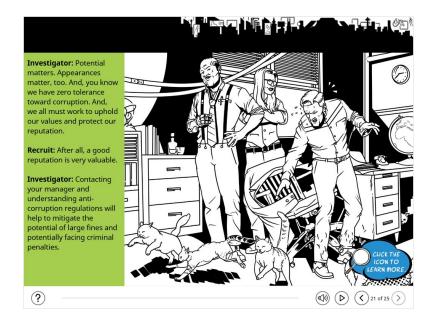
- Favors (e.g., employing official's relative)
- Entertainment, travel, and hospitality
- Charitable donations
- Coupons and gift cards



Investigator: And, it is not necessarily a single incident. It may be a pattern or series of small acts that, when combined, may add up to corruption.

Recruit: It is anything that appears like it has the potential to change someone's mind.

Sales Agent: Potential? Now we are in hypotheticals too?

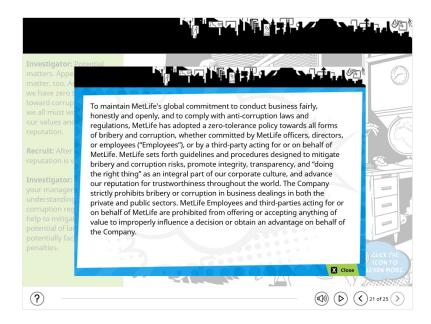


Investigator: Potential matters. Appearances matter, too. And, you know we have zero tolerance toward corruption. And, we all must work to uphold our values and protect our reputation.

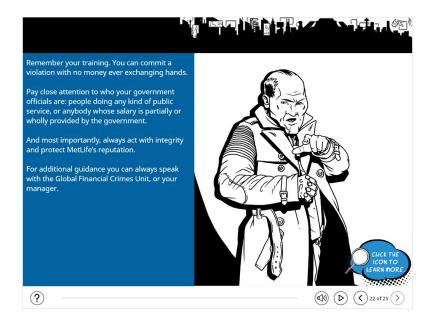
Recruit: After all, a good reputation is very valuable.

Investigator: Contacting your manager and understanding anti-corruption regulations will help to mitigate the potential of large fines and potentially facing criminal penalties.

Click the icon to learn more.



To maintain MetLife's global commitment to conduct business fairly, honestly and openly, and to comply with anti-corruption laws and regulations, MetLife has adopted a zero-tolerance policy towards all forms of bribery and corruption, whether committed by MetLife officers, directors, or employees ("Employees"), or by a third-party acting for or on behalf of MetLife. MetLife 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. The Company strictly prohibits bribery or corruption in business dealings in both the private and public sectors. MetLife Employees and third-parties acting for or on behalf of MetLife are prohibited from offering or accepting anything of value to improperly influence a decision or obtain an advantage on behalf of the Company.



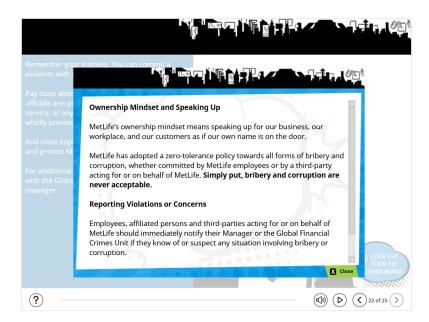
Remember your training. You can commit a violation with no money ever exchanging hands.

Pay close attention to who your government officials are: people doing any kind of public service, or anybody whose salary is partially or wholly provided by the government.

And most importantly, always act with integrity and protect MetLife's reputation.

For additional guidance you can always speak with the Global Financial Crimes Unit, or your manager.

Click the icon to learn more.



Ownership Mindset and Speaking Up

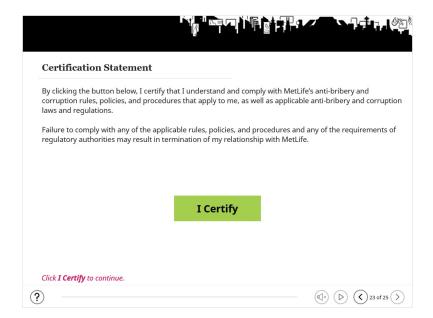
MetLife's ownership mindset means speaking up for our business, our workplace, and our customers as if our own name is on the door.

MetLife has adopted a zero-tolerance policy towards all forms of bribery and corruption, whether committed by MetLife employees or by a third-party acting for or on behalf of MetLife. **Simply put, bribery and corruption are never acceptable**.

Reporting Violations or Concerns

Employees, affiliated persons and third-parties acting for or on behalf of MetLife should immediately notify their Manager or the Global Financial Crimes Unit if they know of or suspect any situation involving bribery or corruption.

Global Financial Crimes Unit: anti-corruption@metlife.com

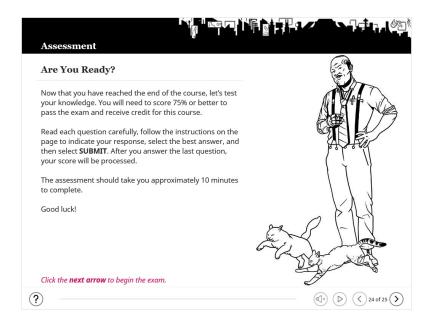


Certification Statement

By clicking the button below, I certify that I understand and comply with MetLife's antibribery and corruption rules, policies, and procedures that apply to me, as well as applicable anti-bribery and corruption laws and regulations.

Failure to comply with any of the applicable rules, policies, and procedures and any of the requirements of regulatory authorities may result in termination of my relationship with MetLife.

Click I Certify to continue.



Are You Ready?

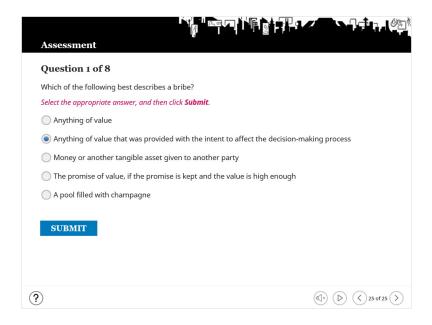
Now that you have reached the end of the course, let's test your knowledge. You will need to score 75% or better to pass the exam and receive credit for this course.

Read each question carefully, follow the instructions on the page to indicate your response, select the best answer, and then select **SUBMIT**. After you answer the last question, your score will be processed.

The assessment should take you approximately 10 minutes to complete.

Good luck!

Click the **next arrow** to begin the exam.

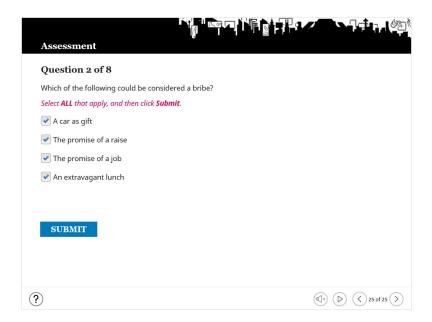


Question 1 of 8

Which of the following best describes a bribe?

Select the appropriate answer, and then click **Submit**.

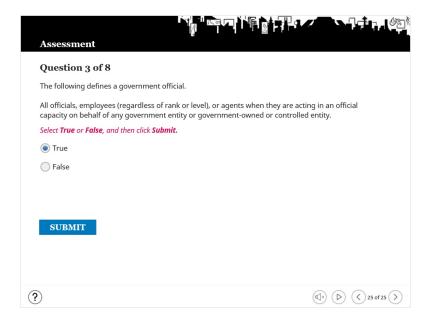
- Anything of value
- Anything of value that was provided with the intent to affect the decision-making process
- Money or another tangible asset given to another party
- The promise of value, if the promise is kept and the value is high enough
- A pool filled with champagne



Question 2 of 8

Which of the following could be considered a bribe?

- A car as gift
- The promise of a raise
- The promise of a job
- An extravagant lunch



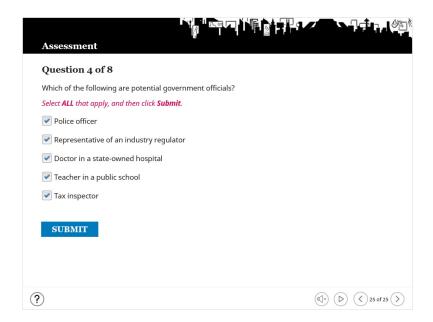
Question 3 of 8

The following defines a government official.

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.

Select True or False, and then click Submit.

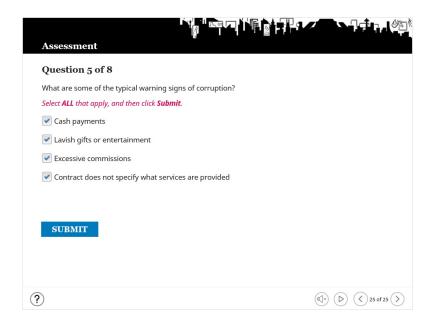
- True
- False



Question 4 of 8

Which of the following are potential government officials?

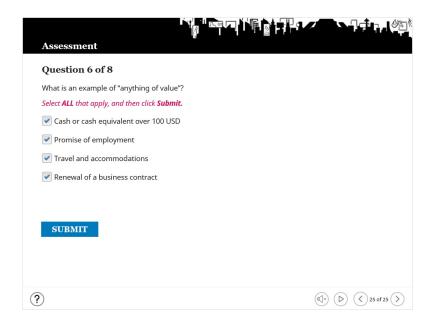
- Police officer
- Representative of an industry regulator
- Doctor in a state-owned hospital
- Teacher in a public school
- Tax inspector



Question 5 of 8

What are some of the typical warning signs of corruption?

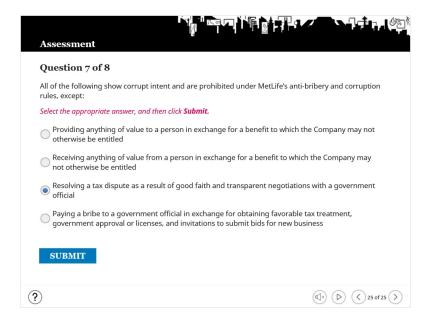
- Cash payments
- Lavish gifts or entertainment
- Excessive commissions
- Contract does not specify what services are provided



Question 6 of 8

What is an example of "anything of value"?

- Cash or cash equivalent over 100 USD
- Promise of employment
- Travel and accommodations
- Renewal of a business contract

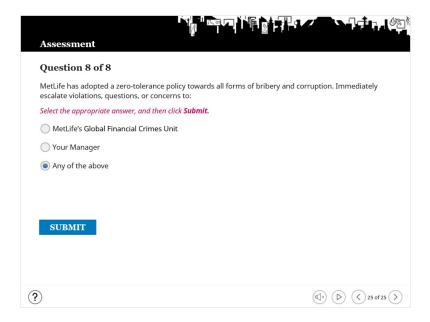


Question 7 of 8

All of the following show corrupt intent and are prohibited under MetLife's anti-bribery and corruption rules, except:

Select the appropriate answer, and then click Submit.

- Providing anything of value to a person in exchange for a benefit to which the Company may not otherwise be entitled
- Receiving anything of value from a person in exchange for a benefit to which the Company may not otherwise be entitled
- Resolving a tax dispute as a result of good faith and transparent negotiations with a government official
- Paying a bribe to a government official in exchange for obtaining favorable tax treatment, government approval or licenses, and invitations to submit bids for new business

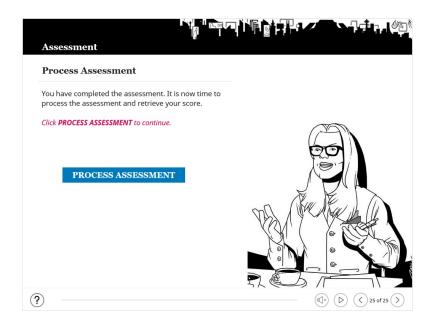


Question 8 of 8

MetLife has adopted a zero-tolerance policy towards all forms of bribery and corruption. Immediately escalate violations, questions, or concerns to:

Select the appropriate answer, and then click **Submit**.

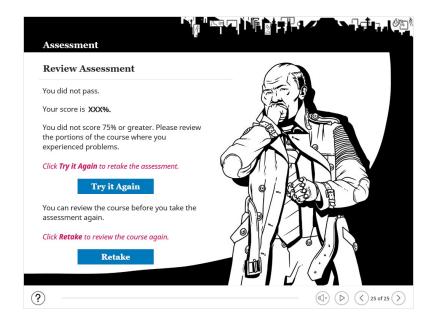
- MetLife's Global Financial Crimes Unit
- Your Manager
- Any of the above



Process Assessment

You have completed the assessment. It is now time to process the assessment and retrieve your score.

Click **PROCESS ASSESSMENT** to continue.



Review Assessment

You did not pass.

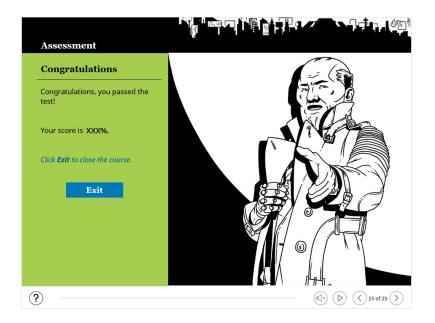
Your score is **XXX%**.

You did not score 75% or greater. Please review the portions of the course where you experienced problems.

Click **Try it Again** to retake the assessment.

You can review the course before you take the assessment again.

Click **Retake** to review the course again.



Congratulations

Congratulations, you passed the test!

Your score is **XXX%**.

Click **Exit** to close the course.