



Supplier Code of Business Ethics

Adopted as of April 2020

INTRODUCTION

For over 150 years MetLife has been in the business of insuring better futures for people around the world. Because of this legacy, our customers expect us to get things right. More than that, they expect us to do things the right way — to exemplify the honesty, integrity and respect that have defined this company since 1868. We expect all those who work with MetLife, including our suppliers, to act in a way consistent with our principles, and to adhere to our standards. It is the responsibility of all Suppliers to comply with the terms of any agreements made with MetLife in addition to the guidelines outlined below.

“MetLife” refers to MetLife, and all affiliates, 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.

“Supplier” refers to any third-party and its personnel, including sub-contractors, providing goods, services, and/or deliverables to MetLife.

BUSINESS PRACTICES AND ETHICS

MetLife’s reputation depends on maintaining the highest standards of conduct in all our business endeavors, including the suppliers we engage. MetLife is committed to conducting business ethically and lawfully in countries where we operate across our supply chain and we expect the same of our suppliers. MetLife 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.

Business and Financial Records

As a large financial services company, MetLife must maintain strict compliance with all laws and regulations governing disclosure, financial reporting, and records. MetLife expects Suppliers to exercise responsible use of any financial records to which they have access and to have proper controls in place to help ensure such use. This includes, but is not limited to, the proper, complete, and accurate recording of all expenses and payments being charged to or received from MetLife.

Data Privacy and Security

Suppliers must maintain and enforce strong privacy policies and data security controls and comply with all applicable data protection laws and regulations as well as contractual obligations to MetLife. Suppliers must take special precautions when storing, processing, or transmitting confidential or proprietary information.



Risk Management

For those goods, services, and deliverables reasonably in scope, Suppliers are expected to have policies in place to comply with MetLife's Third-Party Risk Management (TPRM) program. Suppliers should complete TPRM risk assessment requirements in a timely manner and participate in ongoing monitoring efforts as requested

Suppliers are required to comply with all applicable trade sanctions laws and regulations including import and export laws. Suppliers are prohibited from directly or indirectly providing to MetLife any material or service from a country, person or entity that is subject to U.S. and other applicable regulations that restrict transactions with sanctioned individuals, entities, countries or governments (often referred to as denied, debarred, and/or restricted parties).

Conflicts of Interest

Suppliers should not take action that would impair, or be perceived to impair, the objectivity of its performance putting personal gain or benefit ahead of the interests of MetLife or our customers.

Gifts and Entertainment

The occasional exchange of modest gifts and business entertainment is permitted to the extent that the exchange is appropriately disclosed and does not provide the appearance of impropriety.

HUMAN RIGHTS AND FAIR LABOR PRACTICES

MetLife expects our Suppliers to operate in line with programs representing MetLife's principles, such as MetLife's [Sustainability Program](#), which prioritizes respect for basic human rights within organizations, including rights to health and safety, life and liberty, and equality. At MetLife, a diverse workforce and culture of inclusion are integral to how we do business and how we serve our customers. We expect Suppliers to commit to inclusive business practices ensuring equal employment opportunity without discrimination or harassment on any basis. Suppliers are encouraged to participate in the [MetLife Supplier Inclusion and Diversity Program](#) in recognition and support of our shared commitment.

Suppliers should comply with all applicable federal, state, and local employment, equal opportunity, labor, immigration, and wage and hour laws, including those relating to humane treatment, child labor, minimum wage, overtime hours, and legally mandated benefits.

ENVIRONMENTAL PROTECTION

MetLife has a longstanding commitment to [environmental stewardship](#). We expect our Suppliers to comply with all applicable environmental laws and regulations and we invite our Suppliers to align with best practices, and implement systems designed to minimize impact on the environment. Suppliers are encouraged to participate in the MetLife Supply Chain Sustainability Program and disclose their environmental targets, key performance metrics and strategies to reduce their operational impact.



HOW TO REPORT A CONCERN

We rely on our Suppliers to report issues or concerns related to unethical or illegal conduct, including but not limited to, employment practices, work environment concerns, fraud, financial or accounting practices, and violations of policies.

The below reporting channel is available for any issues and/or concerns:

[MetLife Ethics and Fraud HelpLine](#)

Retaliation

MetLife does not tolerate retaliation. We consider acts of retaliation to be misconduct that can result in disciplinary action, up to and including termination. We seek to provide a safe, healthy and productive workplace for our employees and our business partners who assist us in our business operations and invite our Suppliers to adopt similar internal procedures.