

## Financial Management Code of Business Ethics

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Amended as of March 11, 2020

### INTRODUCTION

This Code of Business Ethics applies to the Chief Executive Officer, the Chief Financial Officer, the Chief Accounting Officer, the Corporate Controller, the Financial Officers and Controllers of each business unit, and all professionals in a finance, accounting, treasury, tax, actuarial, audit or investor relations role in the MetLife enterprise. Such professionals are expected to adhere to this Code, take personal responsibility for conducting the business endeavors of MetLife fairly, promote a culture of honesty and accountability, and act and advocate that others act in conformity with the core values of MetLife and this Code. These professionals are also expected to adhere to the MetLife Code of Business Ethics as well as all other applicable MetLife policies and guidelines.

Every employee involved in financial management in the MetLife enterprise shall:

- Act honestly and ethically, avoid or resolve actual or apparent conflicts of interest in personal and professional relationships, and promptly disclose any material transaction or relationship that reasonably could be expected to give rise to such a conflict of interest to the General Counsel or as provided in the MetLife Code of Business Ethics.
- Promote and provide appropriate disclosures to stakeholders that present fairly the information therein (e.g., accurately, completely, objectively, relevantly, timely and understandably), in accordance with applicable laws, rules and regulations.
- Comply with applicable laws, rules and regulations of federal, state, foreign and local governments, and private and public regulatory agencies.
- Adhere to, and, where applicable, monitor and improve, MetLife's processes to maintain effective internal control over financial reporting.
- Act in good faith, responsibly, with due care, competence and diligence, using considered, professional, independent judgment, and always seek to present all reasonably available material information on a timely basis to management and others in accordance with MetLife policies.
- Protect the confidentiality of information acquired in the course of his or her work.
- Use confidential information acquired in the course of his or her work only for proper MetLife business purposes, and not for personal advantage.



- Proactively promote and be an example of ethical behavior as a responsible partner among peers and other associates in the work environment.
- Promptly report violations of this Code using the procedures set forth under the Personal Responsibility section of the MetLife Code of Business Ethics for reporting violations under that Code.

#### **ADMINISTRATION**

In the event of any question as to whether an associate is subject to this Code, the MetLife, Inc. Chief Financial Officer shall make a determination of its applicability and inform the appropriate business units and Corporate Ethics and Compliance.

This Code shall be administered as provided in the Code and the Law and Ethical Conduct sections of the MetLife Code of Business Ethics for enforcement of that Code. Violators of this Code and those who supervise or manage them shall be subject to disciplinary action.

Managers who retaliate against an employee reporting a violation shall be subject to disciplinary action.

Disciplinary action may include, but is not limited to, reprimands and warnings, probation, suspension, demotion, reassignment, reduction in compensation or immediate termination. Certain actions and omissions prohibited by the Code might also be unlawful and could lead to criminal prosecution, the imposition of fines or imprisonment. Only the Board of Directors or the Audit Committee may waive provisions of this Code for the Chief Executive Officer, the Chief Financial Officer, the Chief Accounting Officer or the Corporate Controller and any such waiver shall be promptly disclosed in accordance with applicable laws, rules and regulations.