



MetLife Exclusionary Screens and Divestment Policy

Guided by our recently established purpose statement, MetLife examined its approach to environmental stewardship and commitment to ensuring the health and wellbeing of our customers, employees and stakeholders in the communities in which we operate. The investments identified for exclusionary screens and divestment do not align to our corporate purpose.

Exclusionary Screens and Divestment Policy

For MetLife's general account portfolios, MetLife is committed to divest existing direct holdings in Assault Weapon Investments, Controversial Weapon Investments and Tobacco Investments. In addition, MetLife will not knowingly make new direct investments for its general account portfolios in any of the foregoing or in Thermal Coal Investments or Oil Sands Investments. Additional details supporting the definitions of these investments and other defined terms are found within the Appendix to this MetLife Exclusionary Screens and Divestment Policy (the Policy).

MetLife intends to implement the Policy by year-end 2020.

Implementation of Policy

MetLife has prepared an Excluded Companies List, which shall be updated on a regular basis.

Upon implementation of this Policy, MetLife will not knowingly make any new investments in any company listed on the Excluded Companies List.

MetLife intends to divest of any existing Tobacco Investments, Assault Weapon Investments and Controversial Weapon Investments by year-end 2020.

The implementation of the Policy is subject in all cases to compliance with applicable local laws, rules and regulations. Accordingly, certain specific implementation mechanisms of the Policy may need to be put in place locally on a staged basis.

A company in which MetLife has existing investments may be subsequently added to the Excluded Companies List. Additionally, MetLife may periodically acquire portfolios of assets through business acquisitions, bulk asset purchases, Pension Risk Transfers or similar transactions that may include Excluded Company investments. In any such situations, MetLife will promptly divest of any such Excluded Company investment, when there is a reasonable opportunity to do so, which may be subject to market, liquidity, portfolio construction and contractual constraints. However, MetLife will apply Thermal Coal and Oil Sands Investments exclusionary screens at the origination of an investment. Accordingly, any existing holdings of Thermal Coal and Oil Sands Investments may be held until maturity.

Scope

The Policy generally applies to the investment assets in the general accounts of MetLife's affiliated insurance companies (AIC). MetLife will also apply the Policy to consolidated MetLife AIC separate account assets, which are controlled by MetLife and managed by MetLife Investment Management (MIM), MetLife's institutional investment management business.



The Policy does not preclude MetLife from purchasing “green bonds” that would otherwise qualify as a Thermal Coal Investment, if the intended use of proceeds is to fund renewable energy production infrastructure and MetLife believes that the issuance is directionally positive in supporting a transition to lower carbon energy sources.

The Policy does not apply to index products, index replications or other indirect exposures, including but not limited to credit default swaps, exchange traded funds, third-party managed investment vehicles where MetLife is a passive investor or commercial mortgage loan tenant exposures.

The Policy is not intended to apply to unaffiliated third-party client assets managed by MIM. MIM applies specific guidelines as requested by its clients and incorporates client directed investment screens into its investment process, as applicable.

Appendix

Definitions

Assault Weapon Investments – Direct investments in companies with revenue generated from the direct production of automatic or semi-automatic assault weapons intended for sale to civilian customers. The exclusion applies to the issuer meeting the foregoing definition as well as its corporate parent. The defined term and exclusion shall not include or apply to: (i) manufacturers of weapons for exclusive use by law enforcement and militaries; (ii) manufacturers of civilian firearms limited to non-automatic or semi-automatic handguns, shotguns, rifles and related ammunition; (iii) retailers and distributors of assault weapons for sale to civilians; or (iv) manufacturers of parts of any of the foregoing.

Controversial Weapon Investments – Direct investments in companies with revenue generated from the direct production of cluster munitions, landmines, biological or chemical weapons. The exclusion shall apply to the issuer meeting the foregoing definition as well as its corporate parent. This exclusion applies to controversial weapons which do not comply with the following treaties or legal bans:

- The Ottawa Treaty (1997) which prohibits the use, stockpiling, production and transfer of anti-personnel mines;
- The Convention on Cluster Munitions (2008) which prohibits the use, stockpiling, production and transfer of cluster munitions;
- The Chemical Weapons Convention (1997) which prohibits the use, stockpiling, production and transfer of chemical weapons; or
- Biological Weapons Convention (1975) which prohibits the use, stockpiling, production and transfer of biological weapons.

Excluded Companies – Issuers determined by MetLife to meet the criteria necessary to be listed on MetLife’s Excluded Companies List, as a result of being deemed any of the following by MetLife: Assault Weapon Investments; Controversial Weapon Investments; Tobacco Investments; Thermal Coal Investments; or Oil Sands Investments.

Excluded Companies List – List prepared and maintained by MetLife, which identifies issuers determined by MetLife to meet the criteria to be deemed Excluded Companies.

MetLife – MetLife, Inc., together with all of its direct and indirect wholly-owned subsidiaries.

MetLife Investment Management (MIM) – MetLife’s institutional investment management business.

Oil Sands – Naturally occurring bitumen-impregnated sands that yield mixtures of liquid hydrocarbon and that require further processing other than mechanical blending before becoming finished petroleum products.

Oil Sands Investments: Direct investments in companies that hold at least 20% of their oil reserves in Oil Sands.



Thermal Coal – lignite, bituminous coal with an ash percentage greater than 35%, and anthracite.¹

Thermal Coal Investments – Direct investments in mining and utility companies deriving 25% or more of their revenue from Thermal Coal. For utility companies, the definition may be applied to include any utility that is distributing power where total generation is more than 25% from Thermal Coal at the time of origination, intending to cover both self-generated and purchased power. The exclusion shall apply only to the issuer meeting the foregoing definition.

Tobacco Investments – Direct investments in companies with revenue generated from the manufacture of finished tobacco, e-cigarette and vaping products. The exclusion shall apply to the issuer meeting the foregoing definition as well as its corporate parent. The defined term and exclusion shall not include or apply to: (i) retailers and distributors of finished tobacco, e-cigarette and vaping products; or (ii) agricultural loans to farm owners or operators.