

Anti-Bribery and Corruption Plan

MetLife strictly prohibits Bribery or Corruption in business dealings in both the private and public sectors. Our Global Anti-Corruption Policy 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. MetLife recognizes the FCPA, the UK Bribery Act, and the local anti-corruption laws in each country where MetLife operates. If there are differences between this policy and local anti-corruption laws, Employees must adhere to the more stringent standard.

Under the Policy, each MetLife operation is required to implement processes and controls to deter, prevent, and detect potential acts of Bribery or Corruption. This includes both MetLife Operations and any Third Party retained by MetLife. In addition, each operation is responsible for ensuring that (i) Employees are familiar with applicable anti-corruption laws; (ii) the Operation maintains a robust anti-corruption compliance program; (iii) ongoing training is provided to senior management, key operating personnel, and other employees; (iv) Employees are updated on any changes to the anti-corruption compliance program and/or regulatory requirements; and (v) risk assessments are conducted in compliance with MetLife’s Global Compliance Risk Management Policy.

The Policy also establishes global oversight of MetLife's anti-corruption compliance program. Global oversight includes (i) drafting and updating written global compliance policies and procedures; (ii) conducting country-level and regional risk assessments; (iii) developing reports for the board of directors and senior management; (iv) advising the lines of business and functional areas on corruption risks; (v) training senior management, key operating personnel, and other employees; (vi) reviewing agreements to assess anti-corruption risk; (vii) overseeing the enhanced due diligence process for potential high-risk Third Parties; (viii) developing compliance strategies in line with anti-corruption laws; (ix) performing substantive testing and face-to-face training during in-person country visits; and (x) assisting Internal Audit in its reviews of the anti-corruption compliance program.

Managing anti-corruption risk is the responsibility of everyone at MetLife. Every line of business serves as the first line of defense in overseeing and managing the day-to-day anti-corruption risks. Anticorruption risks also are governed by MetLife’s oversight functions, including Corporate Ethics & Compliance, as the second line of defense and Internal Audit as the third line of defense.

Hence, control framework includes ABC policy, third party ABC risk management program, whistleblowing channel, ABC annual trainings, Code of Business Ethics, testing and monitoring program.

Compliance function is responsible for the execution, control and review of the ABC plan.

Bribery and corruption

Risk that the Company engages in or facilitates acts of bribery and corruption; including the giving and receiving of anything of value by its employees and third parties in compliance with applicable anti-corruption laws and regulations.

Corrupt people-related practices and decisions

Risk that the Company fails to ensure hiring, terminations and any other people-related practices and decisions are not used to obtain or retain business or obtain preferential treatment from a regulator.

Inappropriate ex-gratia payments

Risk that the Company fails to ensure ex-gratia payments are not used to obtain or retain business or obtain preferential treatment from a regulator.

Ex-gratia is defined as a voluntary payment to a customer where MetLife does not have an obligation to make the payment but does so anyway out of compassion in extreme circumstances or to further good corporate citizenship. These only include payments where MetLife's obligation is not in dispute and it is clear that there is no liability to pay

Inappropriate gifts and entertainment

Risk that the Company fails to ensure gifts, entertainment, prizes, sponsorships, charitable contributions, and other items of value are not used for corrupt purposes.

Inappropriate third-party engagement

Risk that the Company fails to ensure third-parties do not engage in corrupt behaviors on MetLife's behalf. Third-party include select companies, firms or individuals that provide MetLife with the information, products, services, technology, capability, communication, capacity or data that enable it to conduct its operations and service its customers. This includes affiliated and non-affiliated entities, as well as business development transactions resulting in commercial contracts, partnering contracts, marketing agreements or other similar contracts generated by any of MetLife's lines of business, including but not limited to partnership finance, cross-sell and affinity partnership (e.g., suppliers, joint marketing arrangements, merchandise partners and cross sell activity). Third-party administrators, sales agents and brokers are included in this group.

Pursuant to point 4 of article 6 of Royal Decree n.º 109-E/2021, 9 of December, if situations of high or maximum risk were identified, an evaluation report should be drafted in the month of October followed by another report in the following month of April to reflect the degree of implementation of the preventive/corrective measures identified, as well as the forecast of their full implementation.

Area	Activities	Impact	Likelihood	Rating	Mitigating Measures
<p>People Related Practices</p>	<p>Hiring processes:</p> <ul style="list-style-type: none"> • preferential treatment • hiring of PEPs or relatives • conflict of interest • ONU, OFAC, UE sanctioned individual • fitness & probity for key functions (no economic crimes, business honorability) 	M	U	Low	<ul style="list-style-type: none"> • Recruitment Policy • Screening • Conflict of interest disclosure • Code of Conduct • Whistleblowing policy • Whistleblowing channel • Anti-Bribery and corruption policy • Fitness & probity policy • Testing and monitoring

	<p>Employees:</p> <ul style="list-style-type: none"> • Becoming PEPs or relatives • Preferential treatment • Conflict of interest • ONU, OFAC, UE sanctioned individual • fitness & probity for key functions (no economic crimes, business honorability) 	M	M	Low	<ul style="list-style-type: none"> • Screening • Annual performance • Compensation and grades pre-established • Annual conflict of interest disclosure (mandatory for all employees) • Code of Conduct • Whistleblowing policy • Whistleblowing channel • Anti-Bribery and corruption policy • Fitness & probity policy • Testing and monitoring
Inappropriate Third Party Engagement	<p>Procurement and third parties contracting:</p> <ul style="list-style-type: none"> • high risk contracts • high risk jurisdictions • ties with government or public officials 	M	M	Low	<ul style="list-style-type: none"> • Screening • Procurement Policy

	<ul style="list-style-type: none">• bribery acts• facilitation payments• conflict of interest				<ul style="list-style-type: none">• Procurement trainings• Third Party Risk Management (due diligence, risk assessment, ongoing monitoring)• Use of CPI jurisdiction scoring• Whistleblowing policy• Whistleblowing channel• Anti-Bribery and corruption policy• Annual Anti-Bribery and corruption training• Approvals levels and segregation of duties
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<p>Sales & Operations</p>	<p>Sales and operations related practices:</p> <ul style="list-style-type: none"> • % percentage of government entities customers • Bid rigging • Conflict of interest • Preferential treatment • Fraudulent contracting • Money laundering and terrorism financing 	M	M	Low	<ul style="list-style-type: none"> • Sales Quality Policy • Sales practices dashboard • Fraud alerts management • Anti-Bribery and corruption policy • Annual Anti-Bribery and corruption training • Code of Conduct • Whistleblowing policy • Whistleblowing channel • Testing and monitoring • Anti-money laundering policy and counter-

					terrorism financing <ul style="list-style-type: none"> • Anti-money laundering annual training. • Anti-money-laundering annual audit • Specific anti-money laundering controls and reporting
All areas	Inappropriate Gifts and Entertainment (G&E) : <ul style="list-style-type: none"> • Sponsorships • Charitable donations • Offering or receiving gifts • Offering or receiving meals, sports events or any other leisure event • Offering or receiving travelling 	M	M	Low	<ul style="list-style-type: none"> • G&E reporting and disclosure • Review of metrics • G&E approvals • Anti-Bribery and corruption policy • Annual Anti-Bribery and corruption training • Code of Conduct

					<ul style="list-style-type: none">• Whistleblowing policy• Whistleblowing channel• Testing and monitoring
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SEVERITY	RISK TOLERANCE SCALES					
5 Severe	Medium	High	Critical	Critical	Critical	
4 Significant	Medium	Medium	High	Critical	Critical	
3 Moderate	Low	Medium	Medium	High	Critical	
2 Minor	Low	Low	Low	Medium	High	
1 Minimal	Low	Low	Low	Low	Medium	
	A	B	C	D	E	LIKELIHOOD
	Rare Once per 100 years	Unlikely Once per 20 Years	Moderate Once per 10 Years	Likely Once per 3 Years	Very Likely Once or more per Year	