



MetLife Equal Employment Opportunity and Anti-Harassment Policy

At MetLife, equal employment opportunity and inclusion serve as foundational themes in the way that we do business. As a federal contractor, MetLife takes its affirmative action obligations seriously and takes positive steps to attract and maintain a diverse workforce. We remain committed to providing equal access to employment opportunities for our employees and applicants and administering all terms, conditions, and privileges of employment fairly. We stand firmly behind our policies and practices concerning non-discrimination and want to emphasize how important it is for every employee and others with whom we do business to take the time to read this policy and fully support this commitment. This policy applies to conduct by and toward all employees, independent consultants, applicants, clients, customers, and vendors of MetLife, as well as anyone else with whom we do business.

All of our employment practices and procedures are administered without discrimination based on race, color, religion, sex (including pregnancy, childbirth, or related medical conditions), sexual orientation, gender identity or expression, age, disability, national origin, marital or domestic/civil partnership status, genetic information, citizenship status (although applicants and employees must be legally authorized to work in the United States), uniformed service member or veteran status, or any other characteristic protected by applicable federal, state, or local law (“protected characteristics”).

In order to ensure this, our policy is to:

- Recruit and select individuals for employment and promotions solely on the basis of qualifications, job requirements, and job performance;
- Administer all other practices and procedures including compensation, benefits, retention, discontinuance, transfers, training, and self-development opportunities, as well as social and recreational programs, without unlawful discrimination;
- Provide reasonable accommodations for qualified applicants and employees with a disability and the religious observances and practices of applicants and employees;
- Take proactive steps toward the hiring and upward mobility of qualified individuals with a disability, protected veterans, minorities, women, and any other class as required by applicable federal, state or local law;
- Create a workplace with an emphasis on inclusion, where all employees are treated with dignity and respect, in an environment free of any kind of unlawful discrimination or harassment – including sexual harassment, whether verbal or physical; and
- Ensure that employees and applicants are not subjected to harassment, intimidation, retaliation, threats, coercion, or discrimination because they have engaged in, or may engage in, any of the following activities:
 - a) filing a complaint;
 - b) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of any federal, state, or local law or company policy requiring equal opportunity;
 - c) opposing any act or practice made unlawful by any federal, state, or local law or company policy requiring equal opportunity; and
 - d) exercising any other right protected by law.

This policy prohibits harassment, discrimination, and retaliation in the workplace and in any work-related setting outside the workplace such as during business trips, meetings, and business-related social events.

We all share responsibility and ownership for creating and maintaining a respectful and positive work environment. Actions or words that harass or intimidate others based on protected characteristics and/or that are of a sexual nature are strictly forbidden and will not be tolerated. Discriminatory harassment is prohibited by federal and applicable state and local law. Such conduct will result in appropriate corrective action in accordance with MetLife policies and practices, up to and including termination.

Sexual harassment consists of unwelcome sexual advances, requests for sexual favors, and other verbal, physical, or written misconduct of a sexual nature when any of the following criteria are met:

- Submission to such misconduct is made an implicit or explicit term or condition of employment;
- Submission to or rejection of such misconduct is the basis of any employment decision; or
- Such misconduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile, or offensive environment.

Sexual harassment may include a variety of subtle and/or obvious behaviors and may involve individuals of the same or different sex. Some examples of behaviors that may constitute sexual harassment are: sexual jokes and innuendoes; verbal abuse of a sexual nature; leering, whistling, or touching; insulting or obscene comments or gestures; display or circulation in the workplace of sexually suggestive objects or pictures; inquiries into an individual's sex, sexual orientation, gender identity or expression, or sexual experiences; commentaries about a person's body; and any other physical, written, verbal, or visual sexual behavior.

Unwelcome conduct directed toward anyone because of any protected characteristics also constitutes discriminatory harassment when such misconduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile, or offensive environment.

Messages or images sent via hard copy or any electronic media, including those sent by mail, email, online chat, social media, etc., can be a source of harassment. MetLife reserves the right at all times to monitor, disclose, and produce copies of e-mail, online chat, social media messages, and other information exchanged on or using its resources, in accordance with applicable law.

Anyone who feels that he or she has been subjected to any form of harassment, discrimination, retaliation, or other misconduct in violation of this policy should bring this to the immediate attention of MetLife's management or Employee Relations. Anyone may report an incident of discriminatory harassment or other misconduct that violates this policy through any of the channels listed below:

- Employee Relations at 1-877-843-3711;
- The Human Resources Business Partner for your business; or
- Your supervisor or the next-higher levels of management (e.g., Manager, Director, or Officer).

Everyone is welcome to use the channel of his or her choice. A complaint may be initiated in-person, by phone, or in writing, (via email) or by any other means. All complaints will be promptly and appropriately investigated with appropriate levels of confidentiality, in accordance with applicable law.

Retaliation of any kind against anyone who brings a complaint, opposes any alleged violation, or participates in an investigation/hearing concerning an alleged violation of this policy, whether the matter is being handled internally or before a government agency or court, is unlawful and against MetLife policy.

Managers and supervisors are responsible for communicating this policy to all employees and for its successful application and implementation, including ensuring adherence to it in all human resources activities throughout MetLife.

This policy expresses the views of MetLife's Chief Executive Officer and Senior Leadership Team. The Executive Vice President, Chief Human Resources Officer has overall responsibility for the coordination and implementation of MetLife's Equal Opportunity and Anti-Harassment Policy, MetLife's Affirmative Action Program, and any other policies or procedures concerning non-discrimination.

Keeping our workplace free of discrimination, harassment, and retaliation in violation of this policy is our collective responsibility and a corporate priority that is key to MetLife's continued success.

This policy is not a contract and nothing in it alters your relationship with MetLife which, unless advised otherwise, is presumed to be at-will, terminable at any time by you or MetLife, with or without cause, and without prior notice.

Any questions regarding this policy or MetLife's Affirmative Action Program should be directed to your immediate supervisor or to the next-higher level of management. Inquiries may also be directed to Employee Relations at 1-877-843-3711.



Susan M. Podlogar
Executive Vice President & Chief Human Resources Officer