

# Anti-Money Laundering & Sanctions

*Adopted March 26, 2020*

## Anti-Money Laundering Compliance Program

*The following is a synopsis of MetLife's Global Anti-Money Laundering Compliance policy and program*

MetLife, Inc. operates worldwide through subsidiaries, affiliates, branches, and joint ventures (collectively referred to as “MetLife” or “the Company”). Consistent with MetLife’s reputation for trustworthiness and integrity throughout the world, the Company is firmly committed to participating in and complying with international efforts to combat money laundering and the financing of terrorist activities.

The Company maintains a risk-based Global Anti-Money Laundering (“AML”) Program (“the Program”) that helps protect both our clients and franchise from the risks of money laundering, terrorist financing and other financial crimes.

The cornerstone of the Program is the Global Anti-Money Laundering Compliance Policy (the “Policy”). The Policy incorporates enterprise-wide principles and global minimum standards designed to comply with applicable AML laws and regulations including the Bank Secrecy Act, as amended by the USA PATRIOT Act of 2001, and other applicable laws and regulations relating to the prevention of money laundering and terrorist financing in the jurisdictions in which MetLife operates.

Other key components of the AML Program include:

- (i) Designation of a Global Head of Financial Crime Compliance along with regional and local AML Compliance Officers who are responsible for coordinating, monitoring and testing compliance with the Program for their operations and regions, as applicable;
- (ii) A system of internal controls reasonably designed to ensure ongoing compliance with applicable laws and regulations;
- (iii) Processes for complying with applicable Customer Identification Program (CIP) and Know Your Customer (KYC) requirements;
- (iv) Transaction monitoring, due diligence and enhanced due diligence activities;
- (v) Practices for the identification and reporting of suspicious transactions that are required to be reported to government agencies per applicable law or regulation;
- (vi) Providing training to personnel on applicable AML laws, regulations, policies and procedures; and,
- (vii) Independent audit and compliance testing to review and assess compliance with the Program and applicable laws.

The fight against money laundering is a constant and evolving process, and we are aware that preventing money laundering and identifying possible terrorist financing activities involves constant diligence and the ability to keep pace with the sophisticated financial crimes schemes.

We evaluate our existing policies, procedures, training and technologies as necessary to address the changing environment.

## **Sanctions Compliance**

MetLife, Inc. and its employees, wherever located, must comply with sanctions laws applicable to them. In the United States, restrictions imposed by economic and trade sanctions programs are administered and enforced by the U.S. Department of Treasury's Office of Foreign Assets Control ("OFAC"). In addition, MetLife complies with sanctions programs administered by the European Union, the United Nations, and the United Kingdom as well as applicable sanctions laws and regulations in each country in which MetLife operates.

MetLife and its employees may not conduct prohibited business directly or indirectly with sanctioned individuals and entities, including persons on OFAC's Specially Designated Nationals list, or engage in prohibited activities with sanctioned countries.

MetLife has automated sanctions screening and watchlist filtering platforms that are designed to screen individuals, entities and various transactions against designated government sanction watchlists including, but not limited to, the OFAC list, and those published or administered by the jurisdictions in which we operate. The watchlists are regularly updated to help meet regulatory and legal requirements.

In addition, appropriate internal controls enable staff and business units to identify and escalate potential violations to the relevant compliance teams, including the Global Financial Crimes Unit. Sanctions compliance training is also provided to employees.

Compliance with economic and trade sanctions laws is the responsibility of all MetLife employees. MetLife will take appropriate action, including potentially blocking (i.e., freezing) assets or rejecting transactions, to comply with applicable sanction laws and regulations.