

# Brighthouse Financial Code of Conduct for Financial Management

**Version 3.4**

Effective Date: **January 24, 2024**

## Introduction

Brighthouse Financial, Inc. (the “Company”) expects its employees (“Associates”) to adhere to the highest standard of ethical awareness, integrity, and business conduct. Associates must understand and comply with all Company policies and applicable laws and regulations, including those that govern the disclosure, reporting, and recordkeeping of information related to the Company’s financial statements. The Board of Directors of the Company (the “Board”) has adopted this *Code of Conduct for Financial Management* (the “Code”) to establish guiding principles for senior leadership and other Associates engaged in financial management functions.

## Scope

This Code applies to senior leaders and other Associates engaged in financial management functions at the Company (“Financial Managers”). Financial Managers include the following individuals:

- Chief Executive Officer;
- Chief Financial Officer;
- Chief Accounting Officer;
- Chief Auditor;
- Corporate Controller;
- Financial Officers;
- Controllers for applicable business units;
- Associates who perform finance-, accounting-, treasury-, tax-, actuarial-, audit-, and investor relations-related functions for the Company, and
- Any other Associate who may obtain access to any financial records of the Company.

## Code of Conduct for Financial Management

Financial Managers must adhere to both the *Brighthouse Financial Code of Conduct for Employees* as well as this Code, take personal responsibility for conducting the business endeavors of the Company fairly, promote a culture of honesty and accountability, and act and advocate that others act in conformity with the core values of the Company and this Code.

Financial Managers must:

- 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 the Audit Committee of the Board of Directors of the Company (“Audit Committee”);

- Promote and provide appropriate and timely disclosures to stakeholders that present the information therein completely, fairly, accurately, 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 Company processes to maintain effective internal control over financial reporting;
- Exercise responsible use of and control over any financial records to which they have access or control;
- 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 the Company's policies;
- Comply with insider trading laws;
- Protect the confidentiality of information acquired in the course of the Financial Manager's work;
- Use confidential information acquired in the course of the Financial Manager's work only for proper 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; and
- Promptly report violations of this Code to the General Counsel or the Audit Committee.

Financial Managers may report violations of this Code to the Audit Committee by sending a letter marked "Confidential" to the Office of the Corporate Secretary, who will forward the report to the Chair of the Audit Committee. Financial Managers should address any letters to be sent to the Chair of the Audit Committee as follows:

Chair of the Audit Committee  
c/o Office of the Corporate Secretary  
Brighthouse Financial, Inc.  
11225 North Community House Road  
Charlotte, NC 28277

Upon receiving a report, the Chair of the Audit Committee will refer the matter to the General Counsel and Chief Compliance Officer who, under the direction of the Audit Committee, will discretely review, assess, and determine the most appropriate way to respond to the matter in accordance with the standards outlined in the *Brighthouse Financial Whistleblower Policy*. The Audit Committee will report the results of investigations to the full Board of Directors, as appropriate.

## **Administration of the Code**

In the event of any question as to whether an Associate is subject to this Code, the Company's Chief Compliance Officer shall determine its applicability and inform the appropriate business units, as necessary.

Violators of this Code and those who supervise or manage them shall be subject to appropriate disciplinary action. Disciplinary action may include, but is not limited to, reprimands and warnings, probation, suspension, demotion, reassignment, reduction in compensation, or 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.

It is against Company policy to retaliate in any way against any person for the good-faith reporting of possible violations of applicable law, this Code or any other Company policy, or against any person who is assisting in any investigation or process with respect to such a violation. Instances of retaliation will be subject to appropriate disciplinary action.