

Brighthouse Financial, Inc.
Code of Conduct for Financial Management

Effective Date: August 7, 2017

Code of Conduct for Financial Management

As a financial services company, Brighthouse Financial must maintain strict compliance with all laws and regulations governing disclosure, financial reporting, and recordkeeping. Associates must exercise responsible use of and control over any financial records to which they have access or control. This Code of Conduct for Financial Management (this “Code”) applies to the Chief Executive Officer, the Chief Financial Officer, the Chief Accounting Officer, the Corporate Controller, the Financial Officers, the Chief Auditor, Controllers for applicable business units, all professionals in finance, accounting, treasury, tax, actuarial, audit, and investor relations, and any other employee that may obtain access to any financial records covered by this Code. Such professionals are expected to 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.

Each employee involved in financial management within the Company shall:

- 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 Brighthouse Financial 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.
- Act in good faith, responsibly, with due care, competence, and diligence, using considered, professional, independent judgment, and seek at all times to present all reasonably available material information on a timely basis to management and others in accordance with the Company’s policies.
- Protect the confidentiality of information acquired in the course of his or her work.
- Use confidential information acquired in the course of his or her 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 employees in the work environment.
- Promptly report violations of this Code to the General Counsel or the Brighthouse Financial Audit Committee.

Administration

In the event of any question as to whether an employee is subject to this Code, the Company's Chief Compliance Officer shall make a determination of its applicability and inform the appropriate business units and Brighthouse Compliance.

Violators of this Code and those who supervise or manage them shall be subject to appropriate disciplinary action. It is against Company policy to retaliate in any way against any person for 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.

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.