



## **PROCEDURES FOR COMPLAINTS REGARDING ACCOUNTING, INTERNAL ACCOUNTING CONTROLS OR AUDITING MATTERS**

Brighthouse Financial, Inc. ("**Brighthouse**") is committed to achieving compliance with all applicable laws and regulations, accounting standards, accounting controls and audit practices, and the following procedures are designed to encourage such compliance. Any person may submit a good faith complaint regarding accounting, internal controls or auditing matters to the Audit Committee and/or the Chief Compliance Officer of Brighthouse Financial, Inc. ("**Brighthouse**").

In order to facilitate the reporting of complaints, the Audit Committee of the Board of Directors of Brighthouse (the "**Audit Committee**") has established the following procedures for the submission, receipt, retention and treatment of complaints regarding accounting, internal accounting controls, or auditing matters.

### **Scope of Matters Covered by the Policy**

These procedures are for complaints that relate to any questionable accounting practice, internal control, or auditing matter, including, without limitation, the following:

1. Fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement of Brighthouse.
2. Fraud or deliberate error in the recording or maintenance of any financial record of Brighthouse.
3. Manipulation, falsification, or alteration of any accounting record or supporting document.
4. Any deficiency in or noncompliance with Brighthouse's internal accounting controls.
5. Misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports, or audit reports of Brighthouse.
6. Intentional misapplication of accounting principles relating to amounts, classification, manner of presentation, or disclosure.
7. Misappropriation involving theft of Brighthouse assets that may cause financial statements to not be presented, in all material respects, in conformity with generally accepted accounting principles.
8. Any deviation from full and fair reporting of Brighthouse's financial condition.

## **Procedures for Reporting Complaints**

To report a complaint regarding any accounting, internal control, or auditing matter, one of the following methods may be used by a complainant:

1. The individual may call the Brighthouse Compliance and Fraud hotline at 844-4-SIU-FRAUD (844-474-8372) or send an e-mail marked "CONFIDENTIAL" to [investigations@brighthousefinancial.com](mailto:investigations@brighthousefinancial.com).
2. The individual may send a letter to the Audit Committee through regular or interoffice mail marked "CONFIDENTIAL" and addressed 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

3. The individual may send a letter to the Chief Compliance Officer through regular or interoffice mail marked "CONFIDENTIAL" and addressed as follows:

Chief Compliance Officer  
Brighthouse Financial, Inc.  
11225 North Community House Road  
Charlotte, NC 28277

Any complaints that are addressed to the Chair of the Audit Committee shall be provided to the Chair of the Audit Committee unopened.

## **Confidentiality**

Good faith concerns regarding accounting, internal controls, or auditing matters may be reported anonymously if the reporting person prefers. Individuals reporting complaints should keep in mind that it may be more difficult for Brighthouse to thoroughly investigate reports that are made anonymously. If an individual does not report a complaint anonymously, Brighthouse will keep such individual's identity confidential to the extent possible under applicable laws.

## **Treatment of Complaints under this Policy**

Upon receipt of a complaint covered by this policy, the Chair of the Audit Committee will direct the General Counsel and/or the Chief Compliance Officer to (i) determine whether the complaint actually pertains to matters covered by this policy and (ii) if possible, acknowledge receipt of the complaint to the sender.

Complaints relating to matters covered by this policy will be reviewed under the Audit Committee's direction and oversight by the General Counsel and/or the Chief Compliance Officer, or such other persons as the Audit Committee deems to be appropriate. Prompt and corrective action will be taken when and as warranted in the judgment of the Audit Committee.

### **Reporting and Retention of Complaints and Investigations**

Brighthouse will maintain a log of all complaints submitted pursuant to this procedure, tracking their receipt, investigation, and resolution. The General Counsel and/or the Chief Compliance Officer will report the results of such investigations to the Audit Committee, as appropriate. The Audit Committee will report the results of significant investigations to the full Board of Directors, as appropriate.

### **Our Commitment to Non-Retaliation against Employees**

It is against Brighthouse's policy to retaliate in any way against any employee for good faith reporting of possible violations of applicable law, or company policy, or against any employee who assists in any investigation or process with respect to such violation. If an employee reports an activity that an employee believes, in good faith, to be a possible violation of any law, rule, regulation, this policy, or any other internal policy, then Brighthouse will protect the employee from retaliation.

All reports will be investigated and addressed, as appropriate. Any employee who believes he or she has experienced retaliation should report it immediately to Employee Relations. In many jurisdictions, it is unlawful to retaliate against a person for providing truthful information to a regulator or law enforcement officer relating to the possible commission of any offense.