

**MetLife, Inc. Plan for Compliance with  
Consent Order entered into with the Board of Governors of the Federal Reserve System dated April 13, 2011  
Related to Oversight of MetLife Banks's Residential Mortgage Loan Servicing, Loss Mitigation, and Foreclosure Activities (\*1)**

**Status Report as of December 9, 2011**

(\*1) : MetLife Bank's residential mortgage loan servicing, loss mitigation, and foreclosure activities are referred to as "servicing activities" in the status report.

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<p><b>1. Source of Strength:</b> BOD will take appropriate steps to fully utilize MetLife's financial and managerial resources to serve as a source of strength to MetLife Bank (the "Bank"), including taking steps to ensure that the Bank complies with the OCC Consent Order regarding the Bank's servicing activities.</p>	<ul style="list-style-type: none"> <li>• Direct ERM, CEC and Audit to employ resources to support and provide oversight to MetLife Bank</li> <li>• Direct ERM, CEC and Audit to employ resources to ensure MetLife Bank compliance with OCC order</li> </ul>	<p>Immediately/June Board meeting</p>	<p>BOD/Committee</p>	<p><b>2nd Quarter 2011</b></p> <ul style="list-style-type: none"> <li>• In June, the Finance &amp; Risk Committee ("FRC") of MetLife, Inc. ("MetLife") Board of Directors ("BOD") directed Enterprise Risk Management ("ERM"), Corporate Ethics and Compliance ("CEC"), and Internal Audit ("IA") to dedicate appropriate resources to provide support to and oversight of MetLife Bank, particularly with respect to its servicing activities and compliance with the consent order between MetLife Bank and the Office of the Comptroller of the Currency ("OCC Consent Order").</li> <li>• The Law Department ("Law"), ERM, CEC, and IA presented the draft Plan for Compliance with the Consent Order to the FRC, which recommended that the BOD approve submission of the Plan for Compliance to the Federal Reserve.</li> <li>• Following the FRC presentation, the BOD also discussed the Consent Order and delegated oversight of MetLife's compliance with the Consent Order to the FRC.</li> </ul> <p><b>3rd Quarter 2011</b></p> <ul style="list-style-type: none"> <li>• The FRC and BOD reviewed and approved the 2nd quarter progress report required under the Consent Order for submission to the Federal Reserve.</li> <li>• In September, the FRC received a report from ERM, CEC, and IA detailing the findings of the staffing assessments they conducted as required by the Consent Order.</li> <li>• In October, the FRC and BOD reviewed and approved the Risk Management Oversight Policy (see additional information in Risk Management section below).</li> <li>• ERM, CEC, and IA continue to oversee and support MetLife Bank's efforts to comply with the OCC Consent Order by participating in regular MetLife Bank Consent Order Working Group calls and meetings of the MetLife Bank Board's OCC Compliance Committee</li> </ul> <p><b>Next steps</b></p> <p>The FRC will continue to receive regular reporting to ensure that MetLife is</p> <ul style="list-style-type: none"> <li>(i) utilizing its financial and managerial resources to serve as a source of strength to MetLife Bank,</li> <li>(ii) fully implementing the Plan for Compliance with the Consent Order, and</li> <li>(iii) providing oversight of MetLife Bank's servicing activities and efforts to comply with the OCC Consent Order.</li> </ul>
<p><b>2. Board Oversight:</b> Strengthen BOD's oversight of ERM, internal audit, and compliance programs concerning servicing activities.</p>	<ul style="list-style-type: none"> <li>• BOD/Committee will require ERM, CEC, Audit to develop plans to address items 3, 4, and 5 of consent order</li> </ul>	<p>Immediately</p>	<p>ERM, CEC, Audit (see items 3, 4, 5 below)</p>	<p>See Status/Actions Taken Section of Item 1.</p>

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2.(a) Policies to ensure that ERM program provides proper risk management oversight with respect to MetLife Bank's servicing activities, including compliance with Legal Requirements	<ul style="list-style-type: none"> <li>• ERM will lead the development of a formal policy, in coordination with the Bank CRO, MetLife's General Auditor, and MetLife's Chief Compliance Officer, for Finance &amp; Risk Committee and Board approval, which will include the following elements:               <ul style="list-style-type: none"> <li>o Fed &amp; OCC Consent Order Implementation Plan Governance</li> <li>o Post Consent Order Regulatory Finding Risk Response Governance</li> <li>o Board and Internal Committee Delegation of Authority</li> <li>o Bank Management, ERM, Audit, Compliance &amp; IT oversight, assessment and attestation roles and responsibilities, specific to Residential Mortgage Loan Servicing, Loss Mitigation and Foreclosure Activities</li> <li>o Risk assessment and monitoring (e.g. Key Risk Indicator) analysis requirements and reporting requirements to the Board, specific to Residential Mortgage Loan Servicing, Loss Mitigation and Foreclosure Activities</li> </ul> </li> <li>• BOD/Committee will adopt new policies to be proposed by ERM as required in items 2.(a) and 2.(b)</li> </ul>	Policies to be presented to the BOD within 90 days of Federal Reserve approval of Plan (September Board meeting)	<ul style="list-style-type: none"> <li>• ERM to propose</li> <li>• BOD / Committee to adopt</li> </ul>	See Status/Actions Taken Section of Item 1.
2.(b) Proper risk management of 3rd parties engaged to support the Bank's servicing activities	See Plan Elements/Action Items in 2.(a)	See Timing of 2.(a)	See Owner of 2.(a)	See Status/Actions Taken Section of Item 1.
2.(c) Ensure that ERM, audit, and compliance programs have adequate and qualified staffing to oversee MetLife Bank's servicing activities	<ul style="list-style-type: none"> <li>• BOD/Committee will request ERM, CEC, Audit to conduct staffing reviews and report back to Board on findings w/ recommendations; assessment to include organizational and committee resource sufficiency and structure.</li> </ul>	Request ERM, CEC, Audit to begin work immediately; require report back within 90 days of Federal Reserve approval of Plan (September Board meeting)	ERM, CEC, Audit	See Status/Actions Taken Section of Item 1.
2.(d) Improve information and reports related to servicing activities that will be regularly reviewed by BOD/Committee	<ul style="list-style-type: none"> <li>• ERM, in partnership with CEC and Audit, will work with MetLife Bank to develop reports to provide information to MetLife BOD/Committee related to servicing, activities, including compliance with OCC and Federal Reserve consent orders; reports will include:               <ul style="list-style-type: none"> <li>o Risk Assessments</li> <li>o Control Attestation Results</li> <li>o Consent Order Action Plan Status</li> <li>o Other Issue and Action Plan Status</li> <li>o Key Risk Indicator Reporting</li> <li>o Loss Event Reporting</li> </ul> </li> <li>• BOD/Committee will set schedule for receiving reports on servicing activities, including compliance with consent order.</li> </ul>	Begin work on reporting format immediately; BOD/Committee will set reporting schedule at first BOD/Committee meeting after Federal Reserve approval of Plan ("pre-approve" at June Board meeting subject to Federal Reserve approval of Plan)	<ul style="list-style-type: none"> <li>• MetLife Bank, ERM, CEC, Audit</li> <li>• BOD / Committee</li> </ul>	See Status/Actions Taken Section of Item 1.

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<p><b>3. Risk Management</b></p> <p>3.(a) Ensure that risk management program encompasses servicing activities</p>	<p>During Q3 2010, MetLife Bank, in consultation with ERM and the Operational Risk Enhancement Group (OREG) Steering Committee, initiated the design of a front line process level "Risk Control Self Assessment" (RCSA) program. The program incorporates the Enterprise Risk Framework, which provides structure governing how risk classes are defined and how specific risks are assessed in accordance with risk tolerance parameters.</p> <p>For Residential Mortgage Loan Servicing, Loss Mitigation, and Foreclosure processes, MetLife Bank will develop RCSAs:</p> <ul style="list-style-type: none"> <li>• ERM will review and monitor assessment results. Assessments will also be available to Internal Audit and Compliance for review and testing.</li> <li>• ERM, in partnership with Audit and Compliance, will also review and monitor KRIs developed for key RCSA risks.</li> <li>• Results will be reported and reviewed through the MetLife Bank Operational Risk Committee, which will include MetLife ERM, Audit and CEC representation.</li> <li>• Risks which exceed established risk tolerances and limits (see 3c), will be elevated to the enterprise Emerging Risk Committee for monitoring and governance.</li> </ul>	<p>Begin immediately/on-going. Fully implemented within [120 days] of approval of Plan.</p>	<p>ERM</p>	<p><b>2nd Quarter 2011</b></p> <ul style="list-style-type: none"> <li>• MetLife's Enterprise Risk Officer participates on the MetLife Bank board-level Consent Order Compliance Committee.</li> <li>• MetLife's Director of Operational Risk has been added to the membership of MetLife Bank's Operational Risk Committee.</li> <li>• A comprehensive risk assessment of MetLife Bank's risks in the mortgaging servicing operations is underway, with initial discussions with all servicing areas completed and an assessment report being finalized.</li> <li>• Review of the comprehensive risk assessment is underway by MetLife's ERM group.</li> <li>• The development of plans to manage or mitigate any identified risk gaps from the risk assessment of the Bank's mortgaging servicing operations is on track – expected completion in mid-August.</li> <li>• Summarized MetLife Bank risk assessment results are scheduled to be reviewed by MetLife's Enterprise Risk Committee.</li> </ul> <p><b>3rd Quarter 2011</b></p> <ul style="list-style-type: none"> <li>• ERM, in partnership with CEC and Audit, developed a formal "Risk Management Oversight Policy with Respect to MetLife Bank's Mortgage Servicing Activities" and presented it to the FRC and BOD for review and approval. A copy of the policy is included as Attachment A. The Policy:               <ol style="list-style-type: none"> <li>(1) Defines MetLife's oversight objectives;</li> <li>(2) Describes the oversight roles and responsibilities of the BOD, ERM, CEC, and IA;</li> <li>(3) Establishes the ongoing risk oversight, assessment, and attestation processes, roles and responsibilities, including oversight and governance for any regulatory enforcement action related to MetLife Bank's servicing activities;</li> <li>(4) Defines reporting requirements to the FRC; and</li> <li>(5) Confirms that MetLife Bank Vendor Management and Third-Party Administrator policies are applicable to MetLife Bank's servicing activities and describes oversight and risk management activities with respect to third parties engaged to support MetLife Bank's servicing activities</li> </ol> </li> <li>• Completed ERM staffing review and assessment and determined sufficient and adequate resources are in place with respect to governance of MetLife Bank risk. Additionally, ERM recently added an officer-level position to its staff to ensure that it maintains an effective and efficient relationship with the Federal Reserve and other regulators, generally.</li> </ul> <p><b>4th Quarter 2011</b></p> <ul style="list-style-type: none"> <li>• In November 2011, the MetLife Chief Risk Officer and MetLife Enterprise Risk Officer met in Dallas with the Bank Chief Risk Officer to review the Bank's risk profile, including status of the OCC Consent Order.</li> <li>• In November 2011, Bank emerging risk status was reviewed with the MetLife Emerging Risk Committee.</li> </ul> <p><b>Next steps</b></p> <p>Complete Enterprise Risk Self Assessment activities with respect to MetLife Bank (1st Quarter 2012 deliverable).</p>

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3.(b) Ensure that risk management program complies with supervisory guidance	<p>MetLife Bank holds weekly meetings to review all pending regulatory requirements to determine their potential impact on Bank Operations, including OCC supervisory requirements. Compliance participates in the MetLife Bank weekly meetings</p> <ul style="list-style-type: none"> <li>• MetLife's enhanced Compliance Risk Management Program (attached hereto) is specifically designed to comply with Federal Reserve Supervisory Letter SR 08-8. MetLife's Enterprise-wide approach to compliance ensures consistency in compliance risk assessments and compliance monitoring and testing across all lines of business, including the Bank. In addition, MetLife has taken steps to ensure continued regular reporting of the results of its Compliance risk assessments to the MetLife BOD or a committee thereof and has taken steps to ensure the requisite independence of the compliance function from the business units, as required by SR 08-8.</li> <li>• ERM Corporate Governance will continue to receive updates regarding BHC Fed supervisory requirements and implement applicable requirements.</li> </ul>	Begin immediately/on-going. Fully implemented within 90 of approval of Plan.	ERM/CEC	See Status/Actions Taken in item 3.(a.)
3.(c) Establish limits for compliance, legal, and reputational risk and provide for regular review of risk limits	<p>The enterprise risk framework governed by ERM requires management to consider the following impacts for each risk:</p> <ul style="list-style-type: none"> <li>o Financial</li> <li>o Legal / Regulatory</li> <li>o Reputational</li> <li>o Customer</li> </ul> <p>Risk assessments are subject to qualitative and quantitative severity parameters, as well as frequency parameters, to arrive at a risk rating.</p> <ul style="list-style-type: none"> <li>• For each key risk included in the MetLife Bank RCSA for residential mortgage loan servicing, loss mitigation, and foreclosure processes, KRI limits will also be developed by the Bank, subject to ERM approval and CEC and Internal Audit agreement.</li> <li>• As noted in 3b, KRI reporting (including limit exception reporting) will be included in formal committee reporting workstreams, subject to escalation to the Emerging Risk Committee and/or Finance &amp; Risk Committee of the Board where necessary</li> </ul>	Within 90 days after Federal Reserve approval of Plan	ERM	Enterprise KRI program milestones are to be presented to the OREG steering committee 12/15/11. Bank operations, including servicing operations, will be subject to the enterprise program.

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<p><b>4. Compliance Program</b></p> <p>4.(a) Ensure that enterprise-wide compliance program ("ECP") encompasses servicing activities</p>	<ul style="list-style-type: none"> <li>• CEC will work with the Bank's Chief Compliance Officer to ensure that all regulatory risks related to mortgage servicing activity are included in the Legal Inventory maintained by the Bank as part of the Enterprise Compliance Risk Management Program which is overseen by CEC.</li> <li>• CEC will also ensure that the regulatory risks related to mortgage servicing are rated sufficiently high to the Enterprise that they receive heightened scrutiny and regular review and assessment by the Bank's Compliance Department, in accordance with the Enterprise Compliance Risk Management Program Manual.</li> <li>• CEC and Bank Compliance will assess the control environment related to these risks on a quarterly basis and execute an ongoing monitoring and testing program related to these areas. The results of the monitoring and testing activity will be documented and any deficiencies will be assigned responsibility for corrective action. Bank Compliance will take steps to ensure the deficiencies are rectified and CEC will follow up to confirm the same.</li> <li>• CEC will oversee the Bank's execution of the Enterprise Compliance Risk Management Program through regular meetings with the Bank's Chief Compliance Officer to review risk assessment findings. Risk assessment results will also be communicated to senior management at the Bank during quarterly meetings among CEC, Law, Bank Compliance and Bank Senior Management.</li> </ul>	<p>Begin immediately/on-going. Fully implemented within 90 of approval of Plan.</p>	<p>CEC</p>	<p><b>2nd Quarter 2011</b></p> <ul style="list-style-type: none"> <li>• CEC agreed upon a documented oversight framework with MetLife Bank.</li> <li>• CEC assisted MetLife Bank in assessing and enhancing its compliance program as it relates to residential mortgage loan servicing, loss mitigation, and foreclosure activities.</li> <li>• CEC is overseeing the Bank's efforts to comply with the OCC Consent Order by participating in regular Bank Consent Order Working Group calls and meetings of the Bank Board's OCC Compliance Committee</li> <li>• CEC incorporated MetLife Bank into the MetLife enhanced Compliance Risk Management Program.</li> <li>• CEC is receiving compliance reports from MetLife Bank and meeting regularly with MetLife Bank's Chief Compliance Officer.</li> </ul> <p><b>3rd Quarter 2011</b></p> <ul style="list-style-type: none"> <li>• CEC held its quarterly meeting with the Bank's CEO and CRO on July 26th to review the 2nd quarter assessments of the Bank's compliance risks, highlighting the 3 risks that were assessed as "medium" risks as of the end of the 2nd quarter and the steps that the Bank will be taking to further mitigate such risks.</li> <li>• In accordance with the staffing assessment that CEC conducted in the 3rd quarter related to oversight of the Bank's servicing activities, CEC added to staff an Assistant Vice President who was previously working within MetLife Bank and who will be responsible for bank holding company compliance. This individual has over 28 years of banking experience in both business and control functions.</li> <li>• CEC is receiving compliance reports from MetLife Bank and meeting regularly with MetLife Bank's Chief Compliance Officer.</li> </ul> <p><b>4th Quarter 2011</b></p> <ul style="list-style-type: none"> <li>• New Assistant Vice President is attending regular meetings of the Bank's Laws and Regs working group to ensure that regulatory changes are being incorporated in the compliance risk management program.</li> </ul>
<p>4.(b) Ensure ECP complies with supervisory guidance</p>	<p>CEC indicates that Bank is obligated to identify rules, etc. to ensure compliance with supervisory guidance.</p> <ul style="list-style-type: none"> <li>• CEC is currently seeking to hire an officer-level associate whose will be responsible for managing MetLife's compliance program with respect to the Bank Holding Company Act and Federal Reserve regulatory requirements. Among this new associate's responsibilities will be monitoring regulatory developments in these areas and ensuring that the Company has adequate controls and an ongoing monitoring and testing plan in place to ensure compliance with new regulatory requirements emanating from the Bank Holding Company Act or Federal Reserve supervisory notices.</li> <li>• CEC will meet with senior management of the Bank, at least quarterly, to review the state of the Bank's compliance program.</li> </ul>	<p>Begin immediately/on-going. Fully implemented within 90 of approval of Plan.</p>	<p>CEC</p>	<p>See Status/Actions Taken Section of Item 4.(a)</p>

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<p>4.(c) Ensure that policies, procedures and processes are updated on an ongoing basis to incorporate new or changes to legal requirements or supervisory guidance</p>	<ul style="list-style-type: none"> <li>• The Bank is responsible for this function, but CEC will meet with senior management of the Bank, including the Bank's Chief Compliance Officer at least quarterly to review the status of the Bank's compliance risk management program. This review will entail a review of all current risk assessments, regulatory changes, and control deficiencies. As previously indicated, MetLife is hiring a new associate who will work to ensure that all regulatory changes and supervisory guidance makes its way into the Enterprise Compliance Risk Management Program. Once a regulatory change or new requirement is identified and documented in the risk management system, it will be regularly reviewed and assessed as part of the quarterly compliance risk assessment process.</li> <li>• CEC conducts regular meetings with the Bank's Chief Compliance Officer and receives regular reporting of the Bank's key risk indicators, monitoring and testing results, regulatory matters, and internal audit reports.</li> </ul>	<p>Begin immediately/on-going. Fully implemented within 90 of approval of Plan.</p>	<p>CEC</p>	<p>See Status/Actions Taken Section of Item 4.(a)</p>

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<b>5. Audit</b>				
5.(a) Ensure that the internal audit program encompasses residential mortgage loan servicing, Loss Mitigation, and foreclosure activities	<p>MetLife's audit program already covers servicing activities, including ongoing and planned audits related to the Bank's servicing activities and a continuous audit to assess and validate the effectiveness of corrective actions taken and controls implemented by Bank management as a result of the OCC's horizontal foreclosure exam. The audit program has been and, as appropriately, will continue to be reviewed in light of the Federal Reserve and OCC consent orders and MetLife's and the Bank's implementation of their plans to comply with the consent orders to determine whether additional enhancements to the audit program would be beneficial. Specifically, Audit already has or will do the following:</p> <ul style="list-style-type: none"> <li>• Validated that all residential mortgage loan servicing functions are included in the Bank Audit Universe, including Loss Mitigation and foreclosure.</li> <li>• All residential mortgage loan servicing functions have been appropriately re- risked.</li> <li>• Continue on going monitoring of residential mortgage loan servicing risks and re-risk as needed.</li> <li>• Audit Programs will capture all residential mortgage activities by instituting an end-to-end process review. As of 2011, we have implemented Lean Six Sigma tools to identify all activities performed and the associated risks and controls for each residential mortgage loan servicing audit</li> <li>• Internal Audit will review project Plans addressing OCC Consent Order.</li> <li>• Audits in Process: Loss Mitigation and Collections, Reverse Mortgage Foreclosures.</li> <li>• Audit Schedule for the remainder of the year will include high-risk residential mortgage loan servicing functions.</li> <li>• Continuous Audits have been scheduled for the remainder of the year to monitor OCC Consent Order project plan implementation progress and implementation of action plans in resolving the OCC's MRAs</li> </ul>	<ul style="list-style-type: none"> <li>• Within 180 days after Federal Reserve approval of Plan and on-going</li> </ul>	<p style="text-align: center;">Audit</p>	<p><b>2nd Quarter 2011</b></p> <ul style="list-style-type: none"> <li>• IA reviewed auditable areas of MetLife Bank and re-risked the universe of auditable items</li> <li>• IA completed several servicing related audits, with others underway or planned to begin this year.</li> <li>• IA conducted a staffing assessment, the results of which will be presented (along with staffing assessments from ERM and CEC) to the FRC at an upcoming meeting.</li> <li>• IA reviewed audit tracking, resolution, and closure processes and procedures.</li> </ul> <p><b>3rd Quarter 2011</b></p> <ul style="list-style-type: none"> <li>• Audits of the Forward Mortgage Loss Mitigation, Collections, and Reverse Mortgage Foreclosure were completed and results reported to the Bank's Audit Committee.</li> <li>• With respect to the Foreclosure Consent Order and MRAs, an audit validating management's corrective action is in process.</li> <li>• The overall Bank audit resources have been re-evaluated; a shortage of four audit resources has been identified due to the number of high-risk audits and annual required audits. However, due to the heightened focus on mortgage servicing, bank audit resource will be prioritized to the mortgage servicing reviews.</li> <li>• IA's resource shortage strategy is to supplement audit resources with consultants and continue to recruit for additional staff with the required expertise and mortgage servicing knowledge.</li> <li>• With regard to the bank audit staff qualifications, an assessment of mortgage servicing skills and overall qualifications was performed to identify any potential training needs. Experience at previous companies as well as current experience with MetLife was considered in addition to educational background and certifications held. Majority of the auditors' mortgage servicing skills were assessed to be adequate and no immediate additional training is needed. While training needs were identified for two auditors, these auditors had previously been responsible for auditing areas other than servicing activities for the Bank. Training needed was identified and added to their training plan for 2011. Audit will continue to ensure that staff receives proper supervision and is qualified to perform servicing, loss mitigation and foreclosure audits.</li> </ul> <p><b>Next steps</b></p> <p>Continue to report audit results for mortgage servicing audits to management and the Audit Committee as they are finalized; continue to monitor the Bank's progress against OCC Consent Order deliverables and OCC's Matters Requiring Attention, as well as validating management's corrective action taken; continue to monitor for timely resolution of audit issues.</p>
5.(b) Periodically review the effectiveness of the ECP and ERM with respect to servicing activities, and compliance with the Legal Requirements and supervisory guidance of the Board of Governors	<ul style="list-style-type: none"> <li>• Audit will amend the Bank's audit plan to include periodic review of the effectiveness of ECP's and ERM's oversight of the Bank's servicing activities once ECP and ERM have implemented their plans.</li> <li>• Audit will review the action plans for ECP and ERM for appropriate resolution and closure.</li> </ul>	<ul style="list-style-type: none"> <li>• Within 60 days after Federal Reserve approval of Plan.</li> <li>• Within 180 days after Federal Reserve approval of Plan.</li> </ul>		<p>See Status/Actions Taken in item 5.(a)</p>

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5.(c) Ensure that adequate qualified staffing of the audit function is provided for servicing activities.	SEE item 2(c) above. • Bank Audit resource requirements will be evaluated and documented by [June] 30, 2011. • Qualifications of Internal Audit staff dedicated to Bank Audit will be re-evaluated and documented to ensure that qualified staffing is provided to mortgage servicing activities by June 30, 2011. • Mortgage servicing skill set gaps and training requirements will be identified and documented by June 30, 2011.	By June 30, 2011.		See Status/Actions Taken in item 5.(a)
5.(d) Ensure timely resolution of audit findings and follow-up reviews to ensure completion and effectiveness of corrective measures	The Audit Manual includes procedures for audit issue tracking, resolution and closure. Audit currently follows these procedures with respect to its auditing of servicing activities and will follow these procedures in connection with any additional reviews related to the Federal Reserve and OCC consent orders. • In light of the consent orders, Audit will review such procedures and determine if enhancements are needed.	Within 90 days after Federal Reserve approval of Plan.	Audit	See Status/Actions Taken in item 5.(a)
5.(e) Ensure that comprehensive documentation, tracking, and reporting of the status and resolution of audit findings are submitted to the audit committee	See Plan Elements/Action Items in 5.(d)	Within 90 days after Federal Reserve approval of Plan.	Audit	See Status/Actions Taken in item 5.(a)
5.(f) Establish escalation procedures for resolving any differences of opinion between audit staff and management concerning audit exceptions and recommendations, with any disputes to be resolved by the audit committee	The Audit Manual provides guidance for an auditor to resolve issues with management. Audit currently follows these procedures with respect to its auditing of servicing activities and will follow these procedures in connection with any additional reviews related to the Federal Reserve and OCC consent orders. • In light of the consent orders, Audit will review such procedures and determine if enhancements are needed.	Within 90 days after Federal Reserve approval of Plan.		See Status/Actions Taken in item 5.(a)

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<b>6. Plan Approval &amp; Implementation</b>				
6.(a) Submit written plans acceptable to the Federal Reserve	Prepare written plans and submit to Federal Reserve	Within 60 days of date of consent order	BOD, ERM, CEC, Audit, Legal	<p><b>2nd Quarter 2011</b></p> <ul style="list-style-type: none"> <li>The draft Plan for Compliance was submitted to the Federal Reserve Bank of New York ("FRBNY") on June 13 (within 60 days of the date of the Consent Order) and was subsequently ratified by the BOD.</li> </ul> <p><b>3rd Quarter 2011</b></p> <ul style="list-style-type: none"> <li>No change. We continue to await feedback from the Federal Reserve on the Plan for Compliance. 2nd quarter progress report was submitted to the Federal Reserve on October 31.</li> </ul> <p><b>Next steps</b></p> <p>Receive feedback from the Federal Reserve and adopt approved Plan for Compliance; in the meantime, continue efforts to implement the draft Plan for Compliance with emphasis on the action items scheduled for review at an upcoming BOD meetings.</p>
6.(b) Adopt approved plans	BOD/Committee will adopt approved plans	Within 10 days of approval of Plan by Federal Reserve	BOD/Committee	See Status/Actions Taken in item 6.(a)
6.(c) Implement plans, which cannot be amended without prior approval of the Federal Reserve	MetLife will implement plans, which cannot be amended without prior written approval of Federal Reserve	On-going	BOD, ERM, CEC, Audit, Legal	See Status/Actions Taken in item 6.(a)
6.(d) Revise as necessary to reflect new or changes to legal requirements and supervisory guidance.	MetLife will implement plans, which cannot be amended without prior written approval of Federal Reserve	On-going	BOD, ERM, CEC, Audit, Legal	See Status/Actions Taken in item 6.(a)
<b>7. Progress Reports</b>	BOD/Committee to submit progress reports to the Federal Reserve detailing the form and manner of all actions taken	On-going, beginning 30 days after the end of the first calendar quarter following date of consent order	BOD/Committee	See Status/Actions Taken in item 6.(a)

This chart reflects information previously submitted to the Federal Reserve in the form of MetLife's Plan for Compliance with the Consent Order (which was submitted in June 2011) and its 2nd and 3rd quarter progress reports (which were submitted in August and October 2011), as well as updates on actions taken the 4th quarter 2011.