

**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' Residential Mortgage Loan Servicing, Loss Mitigation, and Foreclosure Activities (*)**

December 21, 2011 Update

* MetLife Banks' Residential Mortgage Loan Servicing, Loss Mitigation, and Foreclosure Activities are referred to as "servicing operations" in the status report.

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Consent Order Requirement	Plan Elements/Action Items	Timing	Owner	Status/Actions Taken
5. Audit				
<p>5.(a) Ensure that the internal audit program encompasses residential mortgage loan servicing, Loss Mitigation, and foreclosure activities</p>	<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"> • Validated that all residential mortgage loan servicing functions are included in the Bank Audit Universe, including Loss Mitigation and foreclosure. • All residential mortgage loan servicing functions have been appropriately re- risked. • Continue on going monitoring of residential mortgage loan servicing risks and re-risk as needed. • 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 • Internal Audit will review project Plans addressing OCC Consent Order. • Audits in Process: Loss Mitigation and Collections, Reverse Mortgage Foreclosures. • Audit Schedule for the remainder of the year will include high-risk residential mortgage loan servicing functions. • 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 	<ul style="list-style-type: none"> • Within 180 days after Federal Reserve approval of Plan and on-going 	<p style="text-align: center;">Audit</p>	<p>2nd Quarter 2011</p> <ul style="list-style-type: none"> • IA reviewed auditable areas of MetLife Bank and re-risked the universe of auditable items • IA completed several servicing related audits, with others underway or planned to begin this year. • 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. • IA reviewed audit tracking, resolution, and closure processes and procedures. <p>3rd Quarter 2011</p> <ul style="list-style-type: none"> • Audits of the Forward Mortgage Loss Mitigation, Collections, and Reverse Mortgage Foreclosure were completed and results reported to the Bank's Audit Committee. • With respect to the Foreclosure Consent Order and MRAs, an audit validating management's corrective action is in process. • 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. • 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. • 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. <p>CONTINUED BELOW</p>

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<p>CONTINUED FROM ABOVE 5.(a) Ensure that the internal audit program encompasses residential mortgage loan servicing, Loss Mitigation, and foreclosure activities</p>	<p style="text-align: center;">CONTINUED FROM ABOVE</p>	<p style="text-align: center;">CONTINUED FROM ABOVE</p>	<p style="text-align: center;">CONTINUED FROM ABOVE</p>	<p>CONTINUED FROM ABOVE</p> <p>4th Quarter 2011 - Audit Updates following the Federal Reserve Bank of New York letter of December 16</p> <ul style="list-style-type: none"> • Reporting Line: The reporting line for the General Auditor is under review. We will come to a timely resolution on the matter in advance of the March 31, 2012 implementation deadline set by the Federal Reserve. • Audit Cycle: There are 23 mortgage-related audits, 17 of the 23 are on a 12 month cycle and 6 were on 24 month cycle. We have truncated all the mortgage related audits to no longer than an 18 month cycle. • Staffing: Having added additional internal resources to bank audit, we are currently adequately and appropriately staffed with qualified auditors to execute on our planned mortgage servicing audits in 2012 and those underway in 2011. With MetLife's announcement to sell its bank deposit business, as well as the sale of the forward mortgage business, staffing requirements will be re-evaluated based on the outcome of a sale. If a resource shortfall is identified, we will engage qualified third parties to support our audit plan. • Audit Manual and Follow-up: Once issues are identified in a final audit report, they are tracked by Internal Audit until closure. An Open Issues Report is generated monthly and provided to line of business management, controllers and at least quarterly to the Executive Group. Quarterly reports are issued to the Audit Committees of MetLife Inc. and MetLife Bank. <p>To close an issue, the auditor must obtain sufficient evidence to support the closure. Such evidence is required to be maintained with all issue/action plan workpapers. If an auditor believes that sufficient evidence is not provided to support the closure of an issue, the issue remains open. Testing is required for all critical and high-rated issues prior to issue closure. The process is ongoing and tracked monthly, thus the auditor is expected to begin closure validation when management identifies the issue as ready for closure. Audit management reviews the monthly tracking and if audit does not perform its closure testing within 90 days it will be reported to the Executive Group and the Audit Committee as past due. Past due issues are reported to Executive Management and the Audit Committees of MetLife Inc. and MetLife Bank. Internal audit has a quality assurance and Improvement Program that includes the a review of a sample of closed audit issues three times a year to verify that the closure complied with departmental guidelines. Results of such reviews are reported to the Audit Committee.</p> <p>Audit reviewed and enhanced the escalation procedures documented in our most current version of our audit manual. Results and conclusions of audit work are reviewed with operating and financial management directly responsible for the activity being evaluated and such other management as deemed appropriate. The purpose of reviewing results is to reach agreement as to the facts presented by the auditors and to make management aware of audit issues before the report is released. When appropriate, Legal and Compliance are included in issue discussions. Any unresolved differences between Management and Internal Audit would escalate up to the General Auditor, executive management, and/or Audit Committee, if deemed necessary.</p> <p>Next steps Continue to report audit results for mortgage servicing audits to management and the Audit Committee as they as 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>

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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"> • 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. • Audit will review the action plans for ECP and ERM for appropriate resolution and closure. 	<ul style="list-style-type: none"> • Within 60 days after Federal Reserve approval of Plan. • Within 180 days after Federal Reserve approval of Plan. 		See Status/Actions Taken in item 5.(a)
5.(c) Ensure that adequate qualified staffing of the audit function is provided for servicing activities.	<p>SEE item 2(c) above.</p> <ul style="list-style-type: none"> • 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	<p>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.</p> <ul style="list-style-type: none"> • 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	<p>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.</p> <ul style="list-style-type: none"> • 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)