

Brighthouse Financial, Inc. Business Resilience Plan Disclosure

Brighthouse Financial, Inc. together with each of its subsidiaries and affiliates, including its broker-dealer affiliate (collectively “Brighthouse Financial”), is committed to safeguarding the interests of its clients and customers in the event of an emergency or significant business disruption (SBD). Brighthouse Financial’s comprehensive business resilience strategy is designed to enable Brighthouse Financial to meet its existing obligations to its clients and customers in the event of an emergency or SBD by safeguarding employees’ lives and company property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of Brighthouse Financial’s books and records, and allowing customers to transact business.

Brighthouse Financial’s business resilience strategy includes three major types of business resilience plans (hereafter “Business Resilience Plans”): Business continuity plans, IT disaster recovery plans and crisis management plans. Brighthouse Financial’s Business Resilience Plans address advance preparations and actions to be taken in response to disruptions of various magnitudes. The Business Resilience Plans address the potential impact of varying levels of disruptions to Brighthouse Financial employees, equipment, computer and telecommunications systems and office facilities.

Business Resilience Plans have been developed, tested and approved by management for applicable Brighthouse Financial business services, production IT systems and business locations. The Business Resilience Plans reside in a central location and are routinely updated by functional areas and IT Department staff. The Business Resilience Plans are replicated between two sites that are several hundred miles apart. In addition, Business Impact Analyses are used to keep the Business Resilience Plans aligned with business requirements. Recovery resources are identified in advance and are obtained from several sources. These resources exist either within Brighthouse Financial’s capabilities or are obtained from recovery services vendors under contract.

Functional areas within Brighthouse Financial develop, test and maintain business continuity plans. Brighthouse Financial’s Information Technology Department (“IT Department”) coordinates the development, testing and maintenance of IT disaster recovery plans. The IT Department is responsible for management reporting on all aspects of resilience.

Local crisis management teams are in place in all Brighthouse Financial locations. These local crisis teams are charged with recording and overseeing any potential or actual crisis at the site from the time a situation occurs to the resolution of the incident and resumption of normal business operations.

While it is impossible to anticipate every type of disruption that could affect Brighthouse Financial’s businesses, examples of the incidents covered by the Business Resilience Plans include, but are not limited to, terrorist attacks, hurricanes, floods, fires, bomb threats, earthquakes, public transportation strikes, IT disruptions and cyber-threats. Brighthouse Financial requires third-party providers to maintain back-up systems and power supplies that allow critical computer and telecommunications systems and facility functions to be maintained in the event of a disruption. The duration of the disruption will depend on the nature and extent of the emergency or SBD.

In the event of an SBD where it is not possible to conduct business from any Brighthouse Financial office, employees have the capability to work from home. Brighthouse Financial’s networks and major business applications are replicated daily in different geographical locations. Brighthouse Financial and its third-party providers are generally prepared to restore critical business functionality no later than 72 hours after declaration of an SBD.

Brighthouse Financial's Business Resilience Plans are reviewed as necessary, and at least annually, to ensure they account for changes in technology, business, regulations, operations structure or location. The Business Resilience Plans are subject to change, and material changes will be updated promptly on the Brighthouse Financial public website and all affiliates' websites. You may obtain a current written copy of this notice by contacting a Brighthouse Financial representative or by writing to us at: Brighthouse Financial, 11225 North Community House Road, Charlotte, NC 28277, Attn: Brighthouse Compliance.

This disclosure is intended to comply with the rules promulgated by the Financial Industry Regulatory Authority (FINRA).

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