

Discrimination and Harassment Policy

Policy Objectives

The Discrimination and Harassment Policy reinforces Prudential's values, as well as the Group Code of Business Conduct which requires us all to observe the highest possible standards of personal, professional and ethical conduct at all times, whether at work or not. This Policy further reinforces Prudential's commitment towards creating a safe work environment which fosters and supports our people's mental health and well-being.

This policy is a Group standard that must be adhered to.

Who does this policy apply to?

The policy applies to people who undertake work for Prudential, including:

- all employees, whether full time, part time, on a permanent or fixed term contract (collectively, Employees); and
- all contractors, including but not limited to any contingent, short-term casual workers, interns, people on work experience, consultants and those who undertake work for, but are not employed by, Prudential (collectively, Contractors).

Key Principles

- Prudential is committed to creating and maintaining a welcoming, supportive culture in which all can work in a friendly and professional working environment.
- Prudential prohibits and will not tolerate any form of discrimination, harassment, bullying and other types of misconduct where the behaviour is contrary to Prudential's values and standards.
- Prudential adopts a zero-tolerance stance over retaliation against reporters of any concerns under this policy, based upon an honest perception of the events, or for cooperating or participating in the investigation of a complaint.
- In implementing this policy, Business Units / Local Business Units falling into the scope of this policy will comply with any applicable statutory and/or regulatory requirements in the local labour market.

What types of behaviour are prohibited under this policy?

The policy prohibits discrimination, harassment, bullying and other types of misconduct where the behaviour is contrary to Prudential's values and standards, regardless of whether the conduct is committed against other Employees, Contractors or job applicants, clients, customers, suppliers, visitors or others whom you work or deal with.

Discrimination: Discrimination means treating someone less favourably based on that person's actual or perceived race, colour, nationality, ethnic or national origin, ancestry, age, disability, medical condition, marital or civil partner status, pregnancy or maternity, religion or belief, sex or sexual orientation, gender identity or expression, or any other characteristics protected by local laws and regulations (**Protected Characteristics**).

Discrimination of any form is strictly prohibited under this policy. In particular, any recruitment, promotion, and other selection exercises must always be conducted on the basis of relevant merit and against objective criteria that avoid discrimination.

Discrimination based on perception is also strictly prohibited. Discrimination by perception means treating someone less favourably where a person is perceived, assumed or imputed to have a Protected Characteristic. For example, this can include discrimination of a person based on the perception or assumption that they have a disability, even though they do not.

Harassment: Harassment is any unwanted physical, verbal or non-verbal conduct which offends, humiliates or intimidates another person or creates a hostile, degrading, humiliating or offensive environment for them. Harassment is often based on the recipient having, or is perceived or assumed to have, or is associated with someone who has, one or more of the Protected Characteristics. However, any form of harassment, whether or not based on a Protected Characteristic, will not be tolerated.

Even if the unwanted conduct is not directed at a particular person or if a person is not the intended "target", this is also prohibited under the policy. The motive or intent behind the conduct is irrelevant. For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

Serious cases of harassment may also amount to discrimination or even a criminal offence, involving personal accountability for those responsible.

Sexual harassment: Sexual harassment is any form of harassment (see above) which is of a sexual nature. Anyone, irrespective of gender, can be sexually harassed by someone else of the same or different gender. Behaviour that has been welcomed in the past can become unwanted.

Serious cases of sexual harassment may also amount to a criminal offence, involving personal accountability and liability for those responsible.

Bullying: Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation. Bullying in any form will not be tolerated, whether verbal, written, in-person, online or otherwise.

Legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

Who to speak to about your concerns

If you feel that you have been or are being discriminated against, harassed, bullied or have been subjected to other types misconduct, we encourage you to raise this with us in accordance with this policy. There are a number of options open to you if you wish to raise a concern:

- speak to your line manager;
- speak to the Human Resources Department;

- raise a grievance under the local grievance policy; and/or
- using Prudential's Speak Out confidential reporting facility.

If you have witnessed or have any concerns relating to inappropriate conduct or behaviour towards your colleagues, you should also raise this promptly with your line manager, the Human Resources Department or through the Speak Out reporting facility.

No retaliation for raising concerns

Prudential adopts a zero-tolerance stance over retaliation against reporters of any concerns under this policy, based upon an honest perception of the events, or for cooperating or participating in the investigation of a complaint. Any acts of retaliation will be considered a breach of this policy and sanctions may be applied, up to and including dismissal.