PRUDENTIAL

# Prudential plc
# Group Code of Conduct

For every life, for every future.

# Welcome

Our Code of Conduct ("the Code") provides principles-based guidance to support our daily conduct at work. It underscores our commitment to our customers and to operating with the highest standards of ethics, social responsibility, and sustainability.

Our Code communicates and reinforces the ethical principles our team members should apply in their decision-making. However, we understand that it cannot cover every potential scenario, so we ask you to apply the principles and intent that sits behind the Code when you confront any such scenarios.

We are all expected to adhere strictly to our Code, as well as to our underlying policies, and the relevant laws and regulations in jurisdictions where we operate.

Any violations, whether of the Code, our policies or the law, may lead to disciplinary action, which could include immediate suspension or even termination. Similarly, we expect our external stakeholders – including contractors, advisers, agents and suppliers – to abide by principles consistent with ours. We choose to partner only with those who can meet our rigorous ethical standards.

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# A message from our CEO

**Anil Wadhwani**
Chief Executive Officer

Dear colleagues,

In a world full of complexity and change, trust is more important than ever. It is fundamental to our licence to operate because our customers, colleagues, shareholders, regulators, and communities rely on us to do the right thing, and to have an ethical, responsible, and customer–centric approach to doing business.

With a history that spans almost 180 years, we have earned people's trust by doing what is right – even and especially when times are challenging.

Our reputation is founded not only on meeting expectations, but on demonstrating integrity and sound judgement, and helping to shape what responsible business looks like for the future. Our customers, and all who depend on us, expect us to set the bar high in how we act and the standards we apply. That responsibility extends to how we operate – with good governance, transparency and a focus on long-term resilience.

Prudential operates across many markets, cultures and regulatory environments. While expectations and challenges may differ, our standards do not. This Code of Conduct provides all of us at Prudential with a clear and consistent set of principles to guide how we behave, decide and lead – every day. It also helps us apply those principles across the areas covered in the Code, including customer outcomes, employee conduct, responsible use of technology and data, sound business practices, ethical decision-making and external communications.

Our Code of Conduct helps each of us throughout the organisation to understand the standards; it sets clear expectations for making informed decisions; and it informs us where to go for advice or escalation when it is needed.

Each of us has a responsibility to live the Code – in our decisions, communications and external interactions. Our leaders have additional responsibilities, which are to: role model the behaviours we expect; lead with fairness and consistency; and create environments where people feel safe, respected and confident to speak up. When colleagues raise concerns, ask questions or challenge decisions, they are helping us protect our culture, our customers and the trust that is placed in us. A culture of openness and psychological safety enables better decisions, reduces risk and strengthens trust.

Holding ourselves accountable to the high standards set out in the Code is the foundation of lasting relationships and sustainable performance. Thank you for your commitment to understanding the Code and applying it with care, courage and accountability – every day.

With best regards,

**Anil Wadhwani**
Chief Executive Officer

# How to use this Code

Our Code brings together the principles, behaviours and responsibilities that guide how we work at Prudential. It helps us make informed decisions, understand what is expected of us, and know where to go for advice or escalation.

The Code is organised around the areas where our conduct matters most.

### Our fundamental values
The PruWay sets out the values and behaviours that guide how we work, lead, make decisions and hold ourselves accountable.

### Customers and fair outcomes
We aim to deliver products and services that meet customer needs, protect customer information and support fair treatment throughout the customer journey.

### Colleagues, culture and trust
We are expected to treat one another with respect, support inclusion and wellbeing, maintain a safe working environment and help create a culture where people feel able to speak up.

### Technology, data and AI
We must protect confidential information, use approved systems responsibly, safeguard customer and employee data, and apply appropriate governance when using new technologies, including AI.

### Responsible business and sustainability
This section guides responsible business decisions in practice. We should apply the Code with good judgement, considering whether our actions align with our purpose, sustainability strategy, policies and the expectations we set for ourselves and our partners.

### Ethical behaviour
This section outlines expectations for responsible business practices, good governance, ethical conduct, risk management, bribery and corruption, conflicts of interest, sanctions, supplier selection, accurate records, audits and investigations.

### Reputation and external communications
We must be cautious and considered when representing Prudential, using our brand or communicating externally, including on social media.

### Advice, escalation and Speak Out
Where something is unclear or does not feel right, we should seek guidance or raise concerns promptly through the channels set out in this Code.

### When in doubt, pause and ask
If you are unsure how the Code applies, pause and ask for advice before acting. The right course of action should be consistent with the Code, Prudential's policies, applicable laws and regulations.

# Living The PruWay

Our values and behaviours – known as The PruWay – define not just what we do, but who we are and how we lead at Prudential.

They guide how we make decisions, how we treat one another, and how we deliver for our customers, shareholders, and communities. Living The PruWay means acting with integrity, intention, and accountability – every day, and especially in moments that matter most. This means making decisions that reflect both good judgement and strong values, supporting one another to do the right thing, and holding ourselves and each other accountable for our behaviours.

**We build trusted relationships by creating an environment where:**
- Customers are at the heart of every decision
- Different perspectives are valued and contribute to better outcomes
- We take accountability for both what we deliver and how we deliver it

## Our PruWay values:

### Our customer is our compass
- We immerse ourselves in understanding our customers.
- We commit to our customers' needs and address their pain points with speed and empathy.

### We pursue our entrepreneurial spirit
- We push boundaries and explore new possibilities.
- We are resilient, bouncing back from our failures and moving forward with new insight and energy.

### We succeed together
- We win by collaborating as one team.
- We actively break down silos and work across all levels of the organisation.

### We respect and care for one another
- We are empathetic and treat each other the way we would like to be treated.
- We respect differences and create an environment that is safe where everyone can be themselves.

### We deliver on our commitments
- We make responsible decisions and are accountable for our actions to all stakeholders.
- We are responsive and execute with excellence and integrity.

# Delivering an outstanding customer experience

Helping customers achieve their healthcare and financial goals is at the heart of what we do.

Our life, health insurance and asset management solutions serve millions of customers across markets in Asia and Africa. Here are the principles we follow in our customer-centric approach.

### Treat customers fairly, honestly and with integrity.

It is pivotal that our customers are treated fairly and transparently throughout their journey with us. We are committed to offering products with fair and competitive features and pricing, which ultimately benefits our customers. We also pay attention to managing conflicts of interest and avoiding bias, including in the use of AI.

### Provide and promote products and services that meet customer needs, are clearly explained and that deliver real value.

While customers' financial needs may be straightforward, our products can be complex. It can be challenging for customers to understand costs, value, and how to best utilise our products in their life planning.  We consider customer needs during product development, communicate clearly with customers, and assess the value our products deliver by considering various factors like customer behaviour, circumstances, and expected long-term market returns.

### Maintain the confidentiality of our customer information.

Our customers trust us, our suppliers and our representatives with their personal information. It is our duty to collect, use and safeguard their information properly, both within our systems and when handled by our representatives, suppliers or partners.

### Provide and promote high standards of customer service.

Consistent, high-quality service and communication are essential to meeting our customers' needs and expectations. We have established customer service metrics that cover the entire product lifecycle and customer journey. Timely, fair, and transparent handling of claims is crucial. We promptly disclose any product, contractual, or relevant updates, and ensure timely customer payments.

### Act fairly and timely to address customer complaints and any errors we find.

Customer complaints provide valuable feedback about our business. We have mechanisms in place to identify and address all complaints fairly. We analyse complaints to understand their root causes and work on reducing their overall number. Through ongoing monitoring, we identify any issues that could harm customers and take immediate action to rectify errors.

By adhering to these principles, we strive to deliver excellent customer service, maintain trust, and help our customers achieve their goals.

**You are under pressure to meet a sales target. A customer appears ready to proceed but seems unclear about a key policy exclusion. Raising it again may delay or jeopardise the sale.**

### The PruWay in action:

**Our customer is our compass:**
We ensure customers fully understand what they are buying.

**We deliver on our commitments:**
We prioritise fair customer outcomes over short-term results, even when under pressure.

**We respect and care for one another:**
We act with empathy, recognising that trust is built when customers feel informed and supported.

What good looks like:

- *You pause the process and take the time to clarify the exclusion, ensuring the customer can make an informed decision. You recognise that long-term trust matters more than immediate returns.*

**A customer complains that they were not adequately informed about a policy charge that was disclosed in the policy documentation. While the wording meets technical disclosure requirements, the customer says they did not understand the impact of the charge and feels misled.**

*You should assess whether the customer received a clear and fair explanation in practice. Complaints should be handled promptly and empathetically with appropriate redress, and feed lessons learned into product, sales processes, and conduct improvements.*

# Building trust together

Creating a culture where everyone can thrive.

At Prudential, how we treat one another is fundamental to who we are. We strive to create an environment where every colleague feels respected, included, and able to perform at their best.

## Embracing inclusion and belonging

We operate across diverse markets, cultures, and perspectives. We recognise that our strength comes from valuing these differences and creating space for every voice to be heard.

Living The PruWay means we treat everyone with dignity, empathy, and fairness and we succeed together by actively listening, inviting different perspectives, and creating an environment where people feel safe to speak up.

If something doesn't feel right, we are all responsible for speaking up and supporting one another. Prudential is committed to ensuring concerns can be raised safely and without fear of retaliation.

## Respecting others

We do not tolerate discrimination, harassment (including sexual harassment), bullying or any behaviour that creates a hostile work environment and undermines trust, respect or inclusion. If you experience or witness unprofessional conduct or poor behaviour of any kind, you must report it immediately. Please refer to the Group Human Resources Policy for additional guidance.

As part of our commitment, we must also ensure that personal relationships, including consensual relationships, in the workplace do not give rise to conflicts of interest or other conduct issues. Consensual relationships must be declared in line with Group Human Resources Policy, and any conflicts will be handled in line with the conflicts of interest procedures.

## Supporting wellbeing and safety

Prudential values not only the work of our people, but their wellbeing too. We go to great lengths to foster a workplace that supports both physical and psychological wellbeing.

We are all expected to avoid creating or contributing to health or safety hazards at work, client locations, events or when travelling on Prudential's behalf. Employees must take responsibility for maintaining a safe and healthy environment, looking out for one another's wellbeing, and creating conditions where people can sustain performance without compromising health or safety.

If any employee identifies any situation that could compromise workplace safety, they should report it promptly to their line manager or their Health & Safety representative.

## Security

Employees have an obligation to help ensure the safety of our people, assets and business information by adhering to security standards. We must remain vigilant at work to help avoid security breaches, access to prohibited areas, misuse, losses, sabotage and theft. Threats to our resources, commercial interests can also include those stemming from undue influence, external threats and malicious activity. Any potential breaches or threats should be immediately reported to their line manager or their security representative.

## Change in personal circumstances

We expect the highest level of conduct from our employees, as our team members' reputation affects Prudential's reputation. Matters such as personal bankruptcy and criminal investigation or prosecution must be immediately disclosed to Human Resources.

## Human rights

We are committed to taking measures to prevent Modern Slavery in our own operations, our investments, and our supply chain. This includes established policies and processes, employee training, supply chain assessments, and investing responsibly. Read more in our Modern Slavery Statement, available on our website.

**In a team discussion, you spot a potential issue but hesitate to voice your concerns because more senior colleagues seem aligned and aggressively dismiss alternative views.**

*We encourage our employees to raise concerns, share their opinions, and do not hesitate to ask questions. If you are not comfortable speaking in the moment, follow up promptly with your manager or another trusted leader. Your role is to surface potential risks early, and support better decisions for customers and colleagues.*

**You are facing personal financial difficulties, but they are not currently affecting your work.**

*If your circumstances could create a real or perceived conflict of interest, impact your judgement, or expose you or Prudential to risk, you should speak up early. This may mean talking to your manager, HR, Compliance, or another appropriate support channel. Seeking help is part of acting with integrity, protecting trust, and taking accountability.*

# Safe and responsible technology use

We are committed to prioritising privacy and data security, striving to remain ethically sound as we embrace new technologies.

We respect the privacy of our customers and employees. We safeguard confidential or proprietary information, including sensitive business and personal information received during the course of our work from our customers, employees and third parties.

Employees must not disclose confidential or proprietary information to any person, firm, or entity outside Prudential or use such information for any purpose other than for Prudential business, either during or after their employment.

Everyone must also protect the confidential information of our customers, employees and third parties against unauthorised access, use or disclosure.

## System usage guidelines

IT systems, including computers, networks and communication tools, must be protected by every employee from unauthorised access, damage or theft.

Key policies include:

- Monitoring: subject to local laws and regulations, we reserve the right to review all electronic information (emails, messages and voicemails) on devices and workstations. We also will comply with legal requests for disclosure from regulators and government authorities.
- System Usage: our email system is company property intended for business use.
- Personal Use: occasional and appropriate personal use is permitted only if it does not interfere with your work performance, impact system operations or violate company standards.
- Use of social media or messaging platforms (e.g., WhatsApp, Telegram, etc.) for business communications, corporate messaging, or the sharing of company information is strictly prohibited unless explicitly approved as part of a business process that has been reviewed and endorsed by Group Security and Privacy.

## Artificial intelligence adoption

Artificial intelligence (AI) advancements are shaping the present and future of the insurance and asset management industry. Our goal is to remain at the forefront by providing services that are technologically advanced, ethically sound, and socially responsible. We apply our AI Ethics principles in everything we do. These principles apply to both our own and third-party solutions, ensuring that every AI system and innovation is thoroughly evaluated and monitored continually via appropriate governance for ethical considerations and all types of risks.

Employees are regularly reminded of the critical importance of our AI Ethics principles across all markets, supported by ongoing monitoring and engagement with regulators to ensure AI systems remain aligned with our organisational values, policies and standards. This approach includes safeguarding data privacy, maintaining appropriate human oversight, and ensuring robust protections against cyber threats. This is particularly important as employees begin incorporating AI into their day-to-day work to enhance individual and team productivity.

**I want to send customer information to my personal email to work on it over the weekend. Is this acceptable?**

*No. Customer and business information must only be accessed and stored using approved Prudential systems and controls to protect confidentiality and data security.*

**My team has been developing an AI tool that has access to customer data and profile to recommend suitable products. The tool is expected to be launched soon, and due to tight timelines there is pressure to fast-track deployment, potentially bypassing some governance and review steps. What should I do?**

*AI solutions must comply with Prudential's AI Ethics principles and respective policies. Risks such as bias, fairness, explainability and customer impact should be assessed before deployment.*

**I am working on a project and want to share a dataset containing customer information with an external consultant to speed up analysis. The consultant is trusted. Is this acceptable?**

Yes – *but only under strict conditions and with appropriate safeguards. Customer information must not be shared solely based on trust in the consultant and must comply with Prudential's data protection, privacy, and third-party risk management requirements. Before any sharing, you must ensure there is a clear legal and business purpose, that only the minimum necessary data is disclosed on a need-to-know basis, and that full third-party due diligence has been completed. Data should be anonymised or de-identified. If there is any uncertainty, do not proceed and seek guidance before sharing.*

# Responsible business and sustainability

For Prudential, sustainability means delivering real-world impact and long-term resilience whilst creating and protecting value. Inclusion underpins our strategy and purpose: the resilience of our customers and our business grows as we strive to broaden access to the insurance and investment solutions that bring peace of mind.

We recognise the importance of responsible business practices at all levels of the company. This Code and our policies, which are embedded through our business processes, are the foundation on which we set high standards across fundamental issues. Responsible business practices mean embedding high standards in how we operate – including upholding human rights, setting expectations for our workforce and suppliers, managing environmental impacts and dependencies, supporting employee rights and wellbeing, and acting with strong governance, ethics and transparency.

We place great emphasis on open dialogue with stakeholders. This encourages us to bring forward any issues that may raise ethical questions, and to collaboratively develop acceptable solutions.

By aligning our practices with our purpose and implementing good governance and responsible business practices, we strive to make a positive impact on society through maintaining ethical and transparent operations.

## Our sustainability strategy

Our Code supports our sustainability strategy, which focuses on three pillars:




Our strategy is supported by a strong foundation of which good governance and responsible business practices underpin everything we do. We operate in a regulated financial marketplace and deploy strong governance processes to maintain trust with our stakeholders.

# Ensuring ethical behaviour

As a responsible financial services provider, we are committed to robust risk management and ethical practices to safeguard our business and stakeholders.

## Anti-bribery and corruption

We conduct our business ethically and transparently. We comply with all relevant laws, including the Hong Kong Prevention of Bribery Ordinance (Cap. 201), the UK Bribery Act, and the US Foreign Corrupt Practices Act. Violations of anti-bribery and anti-corruption laws can harm our reputation and lead to severe penalties.

We strictly prohibit any form of payment or offering of favours or anything of value to government officials, political parties, candidates for political office, or public international organisations to improperly influence them or to obtain or retain business. Payments made through business partners or intermediaries that may go to government officials are also prohibited.

## Gifts and hospitality

While reasonable hospitality, such as meals, entertainment, and gifts are acceptable, lavish or frequent hospitality to the same recipient or organisation may be improper. Cash or cash equivalent gifts (e.g. lai see and equivalents) are prohibited. Recording and approval via StarCompliance is required before offering or receiving gifts, or hospitality, or anything of value in accordance with the thresholds, and always when a government official is involved.

All hospitality and gifts must comply with local and international laws, serve a clear business purpose directly related to our objectives, be reasonable in amount, and be offered only in connection with promoting our products or services.

## Charitable donations and corporate sponsorships

We are proud to engage in philanthropic work and consider opportunities for donations and corporate sponsorships, both through the Prudence Foundation and across our business units. Before making contributions, you must ensure they are not payments made to or at the request of government officials for improper advantages. Appropriate due diligence should be conducted prior to any donations and sponsorships, with the intended use of funds understood, documented, and verified before disbursement.

## Anti-money laundering

We are committed to meeting our responsibilities to help prevent money laundering and terrorist financing. Money laundering involves concealing the origins of proceeds obtained from criminal activity, and terrorist financing refers to the raising, moving, using, or providing funds or other resources to support terrorist activities, organisations or individual acts of terror. We comply with applicable laws by carrying out appropriate due diligence, monitoring activity, and reporting suspicious transactions. Preventing money laundering and terrorist financing is everyone's responsibility. Every employee plays a part in protecting our customers, our business and society.

## Financial sanctions

We are firmly committed to complying with all applicable sanctions laws that are legally binding upon the Group and its businesses. We comply with the various legal and regulatory regimes where we operate, and which are relevant to our business.

## Supplier selection

All vendors, supplier and other third parties must be chosen based on performance and merit in a fair and transparent way. Please see our Group Third Party Supply and Outsourcing Policy for more information.

**A manager leading a key project suggests shortcuts around vendor due diligence to meet tight timelines, reassuring that the due diligence will be completed concurrently, in parallel with the project kick-off.**

*You should not kick-off the project without completing Prudential's vendor management and due diligence requirements as this may expose Prudential and its customers to risk.*

**A prospective vendor undergoing a request for proposal invites you to an overseas conference and offers to cover flights, accommodation and entertainment "to strengthen our partnership".**

*You should decline the offer and escalate for guidance. Hospitality must be reasonable, transparent and must not create an obligation or the perception of undue influence – particularly during an active procurement process.*

*Attendance at vendor-hosted conferences may be considered where there is a legitimate business purpose, and the vendor is a long-standing partner. In such cases, the hospitality must be declared, and appropriate approvals obtained in line with Prudential's policies.*

## Disclosing conflicts of interest

To avoid actual or perceived conflicts of interest, personal interests should not influence decisions made on behalf of Prudential. Employees are required to disclose all personal contracts or ownership interests with third parties doing business with the Group in accordance with the conflicts of interest policy and procedures. Unless prior consent from Prudential is obtained, employees are not permitted to be involved in any Prudential business decisions which involve those third parties. Accepting compensation or benefits from others outside of Prudential for work related to your existing Group responsibilities is also prohibited.

Conflicts of interest also arise when immediate family members or friends are employed by suppliers, vendors or customers. Nepotism, including by favouring relatives, friends or other associates in hiring or promotions, is a conflict of interest.

Employees must always act in the best interests of the Group and promote its interests when opportunities arise. We regularly reassess any conflicts that do arise to make sure we are continuing to act in line with our responsibilities and values.

If you are planning to serve as a public official or run for a public office, you must get prior written approval from Group Compliance. It is important to note that some elected positions are excluded from this requirement, please reach out to the compliance team if you need more information.

**A close family member has joined a firm providing professional services to Prudential.**

*You must declare the relationship promptly, and are precluded from any decision making in relation to the vendor relationship. Even where no actual conflict exists, perceived conflicts can undermine trust and decision-making. Disclosure allows Prudential to assess the risk and put appropriate safeguards in place.*

## Anti-competitive practices

We compete fairly and comply with all applicable competition laws where we operate. Employees are expected to comply with all laws relating to anti-competitive practices as well as the Group Competition Law Policy. Please seek guidance when in doubt.

Employees should not discuss, share or improperly use any confidential or competitively sensitive information with our suppliers, peers or competitors. This includes information relating to pricing, costs, commission levels, business performance, business strategy, customers, tenders or markets.

Care should always be taken in interactions with competitors (including at industry events, trade associations, through intermediaries) and when participating in benchmarking surveys or purchasing survey data.

Employees should consult the legal team before making a filing with a competition authority that includes information about Prudential's market position.

## Information sharing and securities dealing

All employees are subject to rules regarding the handling and disclosure of inside information, as well as rules regarding dealings in securities. Inside information is precise, non-public information relating directly or indirectly to a company that, if made public, would be likely to materially affect the price of that company's shares or other securities.

These obligations relate to Prudential plc securities and to the securities of any external listed company. As an employee of Prudential, you may have or come into possession of inside information during the course of your work. You are reminded that you must not use or disclose such inside information, including with respect to any dealings involving Prudential plc securities. Failure to comply can result in regulatory enforcement actions, civil proceedings against Prudential, individual officers, and the individuals involved.

If you possess inside information, it is illegal for you to:

- Engage in any dealings with securities of the company to which the inside information relates (including buying, selling, or agreeing to do so) or share relevant information relating to the company to which the inside information relates (e.g. knowledge of large trades to be placed);
- Advise, encourage, or procure others (including family members, friends, or family companies) to deal in securities of the company to which the inside information relates; or
- Disclose inside information to anyone directly or indirectly, with limited exceptions.

These restrictions also apply to derivatives, such as options or warrants, related to the securities of the company to which the inside information relates. It is everyone's responsibility to comply with our policies on dealings in securities and other derivative products as well as comply with insider trading laws. Breaching these policies and/or laws can have severe consequences, including civil and criminal actions. Employees must familiarise themselves with insider trading regulations applicable to listed securities in general.

If you become aware of inside information relating to Prudential plc, you must escalate it according to the requirements in the Policy.

If you are a Restricted Employee, you must also obtain clearance before dealing in Prudential shares or other securities (this includes entering/leaving PRUshareplus or Share Incentive plans or changing your monthly contributions to those plans).

For a full description of dealing and your responsibilities, refer to the Information Sharing and Securities Dealing Policy.

**I learn inside information about Prudential's financial performance because of my role. Can I discuss this with family or trade shares?**

*No. Using or disclosing inside information is illegal and contrary to Prudential policy.*

## Audits and investigations

Every employee is required to fully cooperate and provide truthful, complete information during external reviews, including regulatory inspections. You must maintain absolute confidentiality of the investigation to protect the integrity of the process. Obstructing an investigation or failing to cooperate can lead to disciplinary action and might result in termination or potential legal referral.

## Maintaining accurate financial records

Maintaining full, clear and accurate records of all payments, expenses, transactions and asset dispositions in accordance with the Group's procedures is crucial for the Group to meet its legal and financial obligations and to manage its business properly. False or misleading entries must never be made in the Group's books or records.

You can report any instances of suspected fraud, accounting irregularities or unethical behaviour using Speak Out procedures. These reports are overseen by Group Investigations to ensure they are all treated fairly and independently. No gifts or items of value should ever be exchanged with external auditors in order to maintain professional independence and objectivity.

**You receive a high value invoice for services provided in the previous month which has not been accrued for. Your manager suggests recording the amount quietly in the next reporting cycle to avoid questions.**

*You should not conceal or defer correction of known errors. Prudential's records must be complete, accurate and transparent. [Undisclosed or unrecorded assets, liabilities, revenues, or expenses are prohibited.] Errors should be corrected promptly, with appropriate disclosure and escalation, in line with internal controls and reporting procedures.*

*You may also be asked to cooperate with auditors and investigators conducting internal or external audits of our activities. You are expected to provide timely information and support. If you fail to do so or are judged to be acting in a way that could hamper any investigations, you will likely face disciplinary action.*

# Representing our business

We encourage our employees to be cautious and considered in all their external communications.

As a publicly listed company with a wide range of stakeholders, including business, political, regulatory, investor, customer and community segments, Prudential has a significant presence and plays a vital role in our communities. All employees are important representatives of our business, especially when engaging in external communications, promoting our products and services, and sharing regulatory announcements. Employees must therefore exercise caution and be thoughtful in their external communications, especially through social media and must not communicate in a way that could reasonably be perceived as representing Prudential unless they are authorised to do so.

All official communications regarding or on behalf of Prudential should only be made by authorised employees and on approved platforms. All such communications (content, platform and timing) must be approved by Group Corporate Affairs. If in doubt, please reach out to the Group Corporate Affairs team.

Additionally, when loading content, and/or communicating via their own social media channels, employees must conduct themselves professionally, avoid activity that could harm Prudential's reputation, breach confidentiality or conflict with our values and policies, and adhere to guidelines contained within the underlying policy.

**I am preparing presentation materials for an external event and want to include the Prudential logo to make the content look more professional. I am speaking in my personal capacity, not on behalf of Prudential. Is this acceptable?**

*No. Prudential's logo and branding must only be used for approved business purposes and by authorised employees, in line with brand and communications guidelines. Using the logo without approval may imply endorsement or official representation and create reputational or regulatory risk. If you are unsure, you should consult local communications team or Group Corporate Affairs before using Prudential branding.*

# Your voice matters

We seek to maintain an open culture where people feel comfortable to call out unacceptable behaviour with confidence.

Though ethical and conduct issues may not always be clear-cut, it is important to raise concerns as soon as they arise and seek guidance before taking action. By doing so, you contribute to Prudential's improvement of its processes and the timely resolution of issues. We value a culture of openness, honesty, and accountability, and encourage you to speak up and ask for help whenever you have concerns or questions.

You can reach out to the following resources for assistance:

- Your direct manager or another senior manager;
- Your Human Resources representative;
- Colleagues from Risk and Compliance or Legal; or
- The Group's Chief Risk and Compliance Officer, Chief Human Resources Officer or General Counsel.

If you are not comfortable raising issues through these channels, you can use our Speak Out Confidential Reporting Hotline or web portal (hosted by Case IQ).

Our Speak Out Hotline and Portal are available 24/7, free of charge and confidential. If you prefer to remain anonymous, you can make an anonymous report.

We strictly prohibit retaliation against individuals who, in good faith, report or raise qualifying concerns about violations of laws, regulations, Group policies, the Code or other misconduct.

This means that reports should be made with honest intentions and include all relevant information.

Any adverse action taken in retaliation against an employee who has raised a question or concern in good faith may result in disciplinary action, including termination of employment.