



Group Speak Out and Investigation Policy

Purpose

'Speak Out' is the Group's whistleblowing program and has been implemented to receive matters of ethics, compliance or Group Code of Conduct. Speak Out is a global, multi-lingual, independently operated, confidential reporting program made accessible to all employees, contractors, vendors, agents, clients and members of the public. The Group Speak Out & Investigations Policy ('Policy') is part of a set of Group Governance policies that addresses the reporting of conduct risks, policy violations and other potential employee wrongdoing to which the Prudential Group ("Group") is exposed. This policy also governs the investigative response to reported Speak Out Concerns, and more broadly to self-identified incidents that represent risks to the Group. The policy defines how investigations should be conducted so that the risk of illegal, unethical or inappropriate investigation activity is mitigated.

Principles

This Policy complies with global and local legal and regulatory whistleblowing requirements and supports a culture of openness, honesty and accountability that requires the highest possible standards of professional and ethical conduct from all employees. This Policy sets the framework by which the Group can reinforce one of the Group's core values in the Group Code of Conduct: Integrity. Consequently, it is fundamental that any genuine Concerns of suspected wrongdoing are listened to, treated seriously and investigated.

All investigations, whether initiated in response to Speak Out Concerns or in response to business identified incidents must be conducted confidentially, legally, ethically and appropriately in accordance with the Group's regulatory and legal obligations.

The Group has 'zero tolerance' to retaliation against reporters of any Concerns raised through Speak Out. Reporters raising any Concern must not be victimized, discharged, threatened, suspended, reprimanded, harassed, disciplined, have payment of salary and/or benefit withheld or suspended, demoted, transferred or otherwise be subject to any disciplinary or retaliatory action related to the terms and conditions of employment.

The Speak Out reporting program is accessible to all employees, contractors, vendors, agents, clients in a language of their choice, and disclosure could be made through a range of communication methods. Further information is available on the Speak Out website. Speak Out is operated by a third-party supplier that specializes in ethics and compliance programs. The set-up ensures maximum confidentiality, as reports are stored on a database outside the Prudential Group environment.

All investigations are carried out by appropriately trained and experienced investigators and are proportionate, independent and objective, and only lawful, ethical, necessary, proportionate and appropriate access is gained to IT systems, records and sources of data.

Businesses must ensure that nothing in their arrangements (including any employment contract or settlement agreement or any other related or ancillary documents) prevents or discourages employees or agents from raising Concerns directly to the local regulator, or any



other body empowered to receive whistleblowing reports in the relevant jurisdiction.

Each Concern must be treated confidentially and the anonymity of the person raising the Concern maintained when desired and legally permissible.