

Corporate political engagement and political donations

Prudential is committed to ethical behaviour, integrity and responsibility in its political engagement. Our Group Governance Manual incorporates the Group Code of Business Conduct and sets out the general principles by which we conduct our business, setting the ethical standards which the plc Board requires of all working on behalf of the Group, in their dealings with employees, customers, shareholders, suppliers, other stakeholders, competitors, the wider community and the environment.

In each market where we operate, Prudential works in partnership with a range of stakeholders, including governments, regulators, central banks, global regulatory and policy bodies, charities, trade associations, regulators and academics to inform and shape public policy discussions in a range of areas including access to and affordability of financial services, financial education, customer protection, demographics, financial market development, job creation, skills, transparency, governance, tax, responsible business, regulatory development, trade, long-term investment and sustainable finance, climate-related risk, privacy and data security, and cyber security. Engaging in public policy discussions can involve responding to information requests and consultation papers, taking part in in-person or online discussion or debate on policy issues, sponsoring or hosting research or policy events by think tanks or academic or other research institutions, and supporting capacity building initiatives organised by partners.

Prudential has a policy covering communication with government officials, which ensures that political engagement is coordinated by local CEOs, local and Group-level government relations teams.

It is Prudential plc policy not to make political donations. This is defined as covering any political party or candidate or any other organisation which attempts to affect support for any political party. It is defined as covering any payment or gift or contribution, direct or indirect, as defined by the UK's Political Parties, Elections and Referendums Act 2000:

<https://www.legislation.gov.uk/ukpga/2000/41/part/IV/chapter/1>

The policy covers expenditure on engagement activity on public policy discussions, as outlined above.

The policy applies across the Group. There is a regular process for ensuring that all headquarters and business units comply with the policy and confirm that no political donations or contributions have been made.

All of Prudential's employees undertake regular mandatory training on a range of areas such as PEPS, AML, Bribery and corruption to ensure their knowledge of the latest policies and procedures is up to date. Prudential is subject to a range of legal and regulatory obligations which require identification and management of actual, potential or perceived conflicts of interest, and we have internal processes in place to ensure this.

The responsible person and point of contact is Matt Cavanagh, Group Director of Government Relations.