

Group Anti-Bribery and Corruption Policy

Prudential values its reputation for honesty, financial probity and reliability. It believes that any involvement in bribery and corruption will reflect adversely on its brand and reputation. Its aim therefore is to limit its exposure to these risk by:

- Setting out clear policy and standards on Anti-Bribery & Corruption;
- Training employees how to prevent and detect the use of bribery and corruption by its staff and third parties with whom it conducts business;
- Regularly conducting comprehensive risk assessments across business activities, including changes to products, processes and systems. These exercises document the inherent risks, controls in place to mitigate them, and the residual risks;
- Conducting appropriate due diligence ("DD") on a risk sensitive basis prior to entering a relationship with a customer, beneficial owner, supplier, vendor, employee, contractor or other third party, and periodically thereafter;
- Implementing effective controls to review, approve, record and monitor the offer and acceptance of gifts, hospitality, charitable donations and sponsorships. All such activities must be assessed for bribery and corruption risks to prevent any instances of actual or perceived breaches, particularly those involving government officials;
- Encouraging employees to be vigilant and report any suspicion of bribery and corruption, providing them with confidential reporting channels and ensuring sensitive information is treated securely;
- Rigorously investigating instances of alleged bribery and corruption, co-operating with regulators and law enforcement agencies in any externally-led investigations;
- Taking firm and vigorous action against any individual(s) involved in bribery and corruption.