

POLICIES AND PROCEDURES FOR COMPLAINTS AGAINST ILLEGAL AND UNETHICAL BEHAVIOR

To ensure that complaints and information concerning illegal (including corruption) and unethical behavior are received, addressed and managed in a timely manner, Pru Life UK has established relevant policies and continually adheres to its (1) Anti-bribery and Corruption Policy, (2) Speak Out Confidential Helpline, and (3) Anti-Sexual Harassment Policy and Program.

The aforementioned policies include procedures to ensure that the employees who reveal illegal/unethical behavior are protected from retaliation.

The foregoing are in addition to applicable laws and regulatory requirements governing Pru Life UK.

I. Pru Life UK's Anti-Bribery and Corruption Policy

Bribery is the offering, promising, giving, solicitation, payment or the receipt or agreement to receive any financial or other advantage, or any other inducement from any person or company of any value to improperly influence their actions (wherever they are situated and whether they are a public official or body, or a private person or company) by an individual employee, agent or other person or body acting on the Group's behalf.

Corruption is the abuse of entrusted power for a private gain.

Pru Life UK values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

1. setting zero tolerance for bribery and corruption as the risk appetite; and taking firm and vigorous disciplinary actions consistently against any breach to the appetite;
2. ensuring there are suitable governance arrangements, which includes, but not limited to appointing an Anti-Bribery and Corruption Officer ("**ABCO**") from the Senior Management Team to be accountable for an on-going oversight of the bribery and corruption risk of Pru Life UK and designating a Risk Committee to oversee the bribery and corruption risk;
3. setting reporting and escalation requirements and procedures to ensure:
 - relevant and meaningful management information, using the defined management dashboard or template (Anti-Bribery and Corruption ("**ABC**") Management Information Dashboard, ABC Risk Assessment Template), where appropriate, is provided to the risk oversight team and Pru Life UK Risk Committee at an appropriate frequency and is acted upon in a timely manner;
 - suitable escalation channels are provided so that any breach or potential breach to the ABC risk appetite and ABC policy requirements as well as any other situations that require immediate reporting are timely reported;
4. setting of an escalation process in the event of alleged or suspicious bribery and corruption instances relating to Pru Life UK;

5. providing guidance on gifts and hospitality (G&H) not permitted in the context of anti-bribery and corruption; mandating a register to record G&H that are offered, accepted or rejected; and performing a regular review which includes a reconciliation between the accounting records of the G&H provided to third parties against those logged in the G&H Register on a quarterly basis at a minimum;
6. put in place a conflicts of interest policy to ensure the record of close relationships which could compromise impartial business dealings is properly maintained;
7. including ABC requirements in the policies and procedures relating to engagement of government officials;
8. embedding procedures to effectively manage bribery and corruption in selecting, reviewing and contracting third parties such as associated persons who perform or will perform services on behalf of Pru Life UK, particularly, relating to agents, representatives and intermediaries who are engaged to represent Pru Life UK's interest; compliance with Prudential's Code of Business Conduct including anti-bribery provisions are communicated and followed, with appropriate contractual protections and safeguards in place where necessary;
9. defining guidelines regarding donations, corporate social responsibilities and sponsorship, to ensure there are no instances of political donations made on behalf of Pru Life UK in the course of business; and charitable contributions and sponsorship are allowed only within agreed schemes and guidelines;
10. ensuring the employment, vetting and disciplinary procedures address the relevant bribery and corruption risks; this shall cover interns who are subject to the same risk-based recruitment and pre-employment checks as the permanent employees;
11. ensuring that no facilitation payments are made, i.e. any payment that is made (except where included within a lawful and published tariff of general application) as an inducement to secure or expedite the performance of a routine or necessary action, to which the payer of the facilitation payment has a legal entitlement;
12. ensuring transactions and payments are recorded in the financial books accurately, completely and timely;
13. to ensure that policies and control frameworks to mitigate bribery and corruption risks are appropriately maintained in line with the Group-wide ABC policy and control framework; and address the relevant local regulatory and legal requirements; and
14. that in the event of doubt as to whether a potential act constitutes bribery, employees shall refer the matter to the local ABCO before proceeding. The local ABCO shall assess and report the outcome of any referral and advise Regional Financial Crimes as required.

Pru Life UK absolutely forbids corruption and the paying or receipt of bribes for any purpose.
Example of prohibited gifts and hospitality (“G&H”):

1. gifts of cash or cash equivalents¹, cheque or bank transfer, unless this is part of a local approach approved by Regional Compliance (e.g. gift checks, gift certificates, loans, shares or share options);
2. G&H that are lavish, excessive, indecent, inappropriate or would damage Pru Life UK and Prudential’s integrity or reputation;
3. G&H that breach any local law or regulation;
4. G&H that the recipient is not permitted to receive by their employer/principal;
5. extravagant meals/refreshment;
6. G&H from/to any third-party during contract negotiation period except:
 - a. branded promotional products of nominal value, e.g., pens, calendars, t-shirts.
 - b. common courtesies such as drinks, sandwiches, modest refreshments provided at Pru Life UK’s or third party’s premises in connection with a legitimate business meeting.
7. G&H from/to any potential suppliers during any procurement, tender or outsourcing process or if it may appear as a recompense award for an award of a tender.
8. goods or services supplied on non-commercial terms;
9. sponsored holidays;
10. bribes to any person or company for the purpose of obtaining or retaining business;
11. advantages to influence public servants and bribes in relation to public contracts, tenders and auctions;
12. any G&H which is intended to influence a decision;
13. where Employees personally pay for G&H (out of pocket expenditures) in order to circumvent the Policy and/or bypass G&H approvals process.

The ABCO or the ABC Team shall be consulted with if there is any doubt on a gift or hospitality that may constitute bribery.

¹ Gift certificates (GCs) from coffee shops may be accepted by Pru Life UK employees provided that it is of nominal value and the business rationale is properly alleged in the GHR.

Giving of GCs or other cash convertible instruments to incentivize Branch Managers/Relationship Managers of bank partners for the referrals made is absolutely prohibited.

II. Speak Out Confidential Helpline

What is Speak Out?

“Speak Out” is the new Confidential Helpline that allows employees and agents of Pru Life UK to ask questions or raise concerns in confidence, without the fear of retaliation or recrimination. This assists Pru Life UK in minimizing the potential risks associated with activities such as organized or personal malpractices, illegal actions and unethical activities and helps Pru Life UK to comply with both regulatory requirements and Prudential Group standards.

Concerns to be Reported

The concerns which should be reported to Speak Out include but are not restricted to:

1. Discrimination or Harassment;
2. Conflict of Interest;
3. Theft/Fraud/Bribery;
4. Environmental Safety;
5. Accounting/Financial; and
6. Policy violations and Misconduct.

Prohibition Against Retaliation

Pru Life UK does not tolerate any retaliatory action against employees and agents who report through Speak Out.

Any reports of possible unfavourable treatment of callers of Speak Out will be reported to the Group and PCA Audit Committees.

Contact Details

All employees and agents of Pru Life UK may contact Speak Out through any of the following:

Speak Out	
Telephone Fax	
Dial direct access number (depending on your telecommunications provider) Philippines:	1800-1-322-0285 or 1010-5511-00 (PLDT-Tagalog Operator) At English prompt, dial: 855-860-2158
	105-11 (Globe, Philcom, Digitel, Smart) At English prompt, dial: 855-860-2158
Website	
www.prudentialspeakout.ethicspoint.com	

III. Pru Life UK's Anti-Sexual Harassment Policy and Program

Pursuant to the provision of Section 4, Republic Act No. 7877, An Act Declaring Sexual Harassment Unlawful in the Employment, Education or Training Environment and for Other Purposes, otherwise known as the "Anti-Sexual Harassment Act of 1995", this policy is issued by the Company to prevent or deter the commissioned acts of sexual harassment in its workplace and to provide the procedures for the resolution, settlement and/or disposition of sexual harassment cases.

The Company believes that employees should be afforded the opportunity to work in an environment free of sexual harassment. Sexual harassment is a form of misconduct that undermines the employment relationship. No employee, either male or female, should be subjected verbally or physically to unsolicited and unwelcome sexual overtures or conduct.

The Company will not tolerate any behavior that amounts to sexual harassment and any employee found to have committed sexual harassment shall be subjected to disciplinary action, up to and including dismissal/termination of employment.

Sexual harassment refers to behavior that is not welcome, that is personally offensive, debilitates morale and, therefore, interferes with work effectiveness. Such behavior, among others, may be in the form of unwanted physical, verbal or visual sexual advances, requests for sexual favors, and other sexually oriented conducts which are offensive or objectionable to the recipient, including but not limited to: epithets, derogatory or suggestive comments, slurs or gestures and offensive posters, cartoons, pictures or drawings.

Coverage

The policy applies to all employees regardless of their employment status.

Complaint Procedure

Any officer or employee, who experiences or witnesses any act of sexual harassment in the workplace shall report the same immediately to the Committee on Decorum and Investigation. They may also report acts of sexual harassment to any other member of management. All allegations of sexual harassment will be investigated within a reasonable time. To the extent possible, the identity of the officer or employee shall remain confidential and that of any witnesses and the alleged harasser will be protected against unnecessary disclosure. When the investigation is completed, all parties will be informed of the outcome of the investigation.

A Committee on Decorum and Investigation shall be constituted, and shall be composed of employee representatives from the management, from the supervisory rank, and from rank and files, to receive complaints, investigate and hear sexual harassment cases. The Committee shall develop its own rules in the settlement and disposition of sexual harassment cases. The Committee shall also develop and implement programs to increase understanding and awareness about sexual harassment

Retaliation

The Company will permit no employment-based retaliation against anyone who brings a complaint of sexual harassment or who speaks as a witness in the investigation of a complaint of sexual harassment.

IV. Discrimination and Harassment Policyⁱ

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 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.

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.

ⁱ [group-discrimination-and-harassment-policy-1.pdf \(prudentialplc.com\)](#)