

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.

Specific Activities

Examples of specific activities on the foregoing are as follows:

1. all departments of Pru Life UK must keep a gifts and hospitality register (GHR) to record gifts given to and received from external parties;
2. all employees must annually execute the Anti-Bribery Self Certification Form;
3. all employees must pass the annual refresher course on the ABC Policy;
4. additional training for employees considered as "high risk" in an ABC perspective is conducted, as and when necessary; and
5. all new hires are required to take and pass the ABC training prior to actual onboarding.

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 or 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; and
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.

Speak Out

"Speak Out" is the 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.

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.

These concerns which should be reported 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.

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	

Details of the 'Speak Out' process may be found in the link below:

<https://secure.ethicspoint.eu/domain/media/en/gui/103269/index.html>