

## **Related Party Transactions Policy**

**PRU LIFE INSURANCE CORPORATION OF U.K.**

### Version History

Ver No	Date	Approved By	Updated By	Change Description
1	Nov, 2017	BOD	Dante Marasigan	
2	Aug 30, 2018	BOD	Dante Marasigan	<p>In Section 5, the term “management” is further clarified as pertaining to Company Officers.</p> <p>Section 10.2 Roles of Senior Management and Self-Assessment Functions is revised to include CFO / Finance role in compiling and cross-checking all Conflict of Interest Declarations to ensure completeness of all reportable RPTs</p>
3	August 20, 2020	BOD	Dante Marasigan	<p>In Section 5 – Conflicts of Interest (COI), the term “Company Officers” who will be disclosing COI on an annual basis is further clarified as pertaining to those with a position of at least Vice President.</p> <p>In Section 7 - Internal Limits for Individual and Aggregate Exposures, the individual internal limit for Investment RPTs is revised from 20% to 11%; while the aggregate internal limit is revised from 25% to 14%.</p> <p>In Section 10.2 – Roles of Senior Management and Self-Assessment Functions particularly on the functions of the CFO, the function owner is revised from just the “CFO” to “either the CFO or Financial Controller”.</p>
4	March 31, 2022	BOD	Dante Marasigan	<p>In Section 10 - Roles of Senior Management and Self-Assessment Functions particularly on Board of Directors and RPT Committee roles to include:</p> <p>The Board of Directors shall be the final approving authority of all material RPTs including any renewal or material changes in the terms and conditions of material RPTs. The following shall require prior RPT Committee endorsement and BOD approval:</p>

				<ul style="list-style-type: none"> <li>i. Transactions which the BOD may determine as posing significant risk or potential abuse to the Company;</li> <li>ii. All write-offs of material exposures with RPTs;</li> <li>iii. Breaches in internal limits;</li> <li>iv. The RPT Policy and its amendments; and</li> <li>v. All RPTs requiring prior regulatory approval.</li> </ul> <p>The RPT Committee and the BOD may approve or disapprove the transaction or provide modifications to approved RPTs.</p> <p>For endorsements and approvals of urgent transactions requiring prior RPT Committee endorsement and BOD approval, the RPT Committee may meet at such other times as determined by a majority of its members or by the Board.</p> <p>In Annex C – Reporting and Approval Process, updated the table on non-material RPTs to align with the provision in Section 10 of the RPT Policy that the Executive Committee shall approve all RPTs that are below the materiality threshold, subject to confirmation by the Board of Directors.</p> <p>In Annex G – RPT Functional Roles, updated the table on non-material RPTs to align with the provision in Section 10 of the RPT Policy that the Executive Committee shall approve all RPTs that are below the materiality threshold, subject to confirmation by the Board of Directors.</p>
5	March 24, 2023	BOD	Dante Marasigan	<p>In Section 3 – Definition of Terms particularly to add the definition of Third Party Provider (“TPP”):</p> <p>Third Party Provider (“TPP”) - is any person, company, contractor, consultant or firm, whether or not a member of the Prudential Group, with whom the Company has entered into a contract for the supply of goods or services. This may also</p>

			<p>include vendors, lessors, affiliates and direct invested counterparties of the Company.</p> <p>In Section 3 – Definition of Terms particularly to add the definition of “officers” who will be considered as related party is further clarified as pertaining to those with a position of at least Vice President.</p> <p>“Officers” pertains to Company officers with a position of at least Vice President.</p> <p>In Section 10.2 - Roles of Senior Management and Self-Assessment Functions particularly to change “Third Parties” to “Third Party Providers” on those who are required to provide updated conflict of interest (COI) Disclosures:</p> <p>All updated Conflict of Interest (COI) Disclosures (from BOD, Officers, Shareholders, Employees, Distribution Partners and Third Party Providers) shall be compiled and must be cross-checked to ensure completeness. All reportable RPTs must be tracked on a quarterly basis.</p> <p>In Annex G – RPT Functional Roles, split Finance function into Finance – Statutory Reporting and Finance – Procurement and GDDA.</p> <p>Also, updated the table on Material RPTs, renewals, and changes in terms &amp; conditions and Write-Off to change CAM to Procurement.</p> <p>Further, combined the current Finance roles to quarterly compile COI information and utilize vendor analyses to align the functional role with GWIA observation wherein Procurement and GDDA shall perform quarterly reconciliation against financial records to ensure the timeliness and completeness of COI disclosures from vendors.</p> <p>In addition, added under Finance – Statutory Reporting the role to compile any COI disclosures of any new relationship the Company has entered</p>
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				<p>from its various departments monthly and determine whether there are any reportable RPTs.</p> <p>In Annex G – RPT Functional Roles, added a role to include conducting yearly trainings for awareness of RPT Policy and its requirements to process owners which will be handled by Finance – Statutory Reporting team.</p>
6	August 24, 2023	BOD	Dante Marasigan	<p>In Section 4 – Guidelines in Ensuring Arm’s Length Terms to add:</p> <p>The Procurement Policies and Guidelines are aligned with the due diligence requirements of this Policy. Note however that local price checking for all material RPTs should still be performed.</p> <p>In Section 10 - Roles of Senior Management and Self-Assessment Functions to add threshold for material RPTs requiring prior RPT Committee endorsement and BOD approval.</p> <p>“ii. Transactions with total contract amount of P300,000,000.00 for Other Items per Affiliate.”</p>
7	September 18, 2025	BOD	Iris Dawn Pepito-Pureza	<p>In Section 3 - Definition of Terms, updated to include the definition of control as provided by Section 290 of the Insurance Code.</p> <p>In Section 9 - Restitution of Losses and Other Remedies for Abusive RPTs, updated to include the specific action for restitution of losses and remedies for abusive RPTs.</p> <p>In Section 11 - Disclosure and Regulatory Reporting, updated to include the 30-day reporting requirement for related party transactions as promulgated by the IC in accordance with Section 300 of Insurance Code.</p> <p>In Annex C – Roles and Reporting Requirement, updated to include letters to IC for approval or notice prior to entering into transactions with any person in the holding company system (under Section 299 and 300 of the Amended Insurance Code).</p>

				In Annex G – Functional Roles, updated to emphasize the business unit/process owner’s responsibility to monitor potential related parties and inform Finance.
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## Table of Contents

<b>1. Objectives</b> .....	<b>8</b>
<b>2. Coverage</b> .....	<b>8</b>
<b>3. Definition of Terms</b> .....	<b>8</b>
<b>4. Guidelines in Ensuring Arm’s Length Terms</b> .....	<b>9</b>
<b>5. Conflicts of Interest</b> .....	<b>10</b>
<b>6. Materiality Thresholds and Excluded Transactions</b> .....	<b>11</b>
<b>7. Internal Limits for Individual and Aggregate Exposures</b> .....	<b>11</b>
<b>8. Whistleblowing Mechanisms</b> .....	<b>12</b>
<b>9. Restitution of Losses and Other Remedies for Abusive RPTs</b> .....	<b>12</b>
<b>10. Roles of Senior Management and Self-Assessment Functions</b> .....	<b>13</b>
<b>11. Disclosure and Regulatory Reporting</b> .....	<b>14</b>
<b>12. Annexes</b> .....	<b>16</b>

## 1. **Objectives**

This Related Party Transactions (“**RPTs**”) Policy is made to ensure that RPT transactions are only undertaken on an arm’s length basis for the financial, commercial, and economic benefit of Pru Life Insurance Corporation of U.K. (the “**Company**”) and the entire group where the Company belongs. This Policy is also made to ensure that there are appropriate oversight and effective control systems for managing RPT exposures as these may potentially lead to abuses that are disadvantageous to the Company, its policyholders, claimants, creditors, and other stakeholders.

## 2. **Coverage**

This RPT Policy shall:

- a. capture a broader spectrum of transactions, covering not only those that give rise to credit and/or counterparty risks but also those that could pose material/special risk or potential abuse to the Company and its stakeholders; and
- b. cover the identification and prevention or management of potential or actual conflicts of interest which may arise.

## 3. **Definition of Terms**

- 3.1 “**Related Party**” or “**Related Parties**” shall cover the Company’s subsidiaries as well as affiliates and special purpose entities that the Company exerts direct/indirect control over or that exerts significant influence over the Company, its Board members, officers, stockholders and related interests, and their Close Family Members, as well as Corresponding Persons in Affiliated Companies. This shall also include such other person/juridical entity whose interests may pose potential conflict with the interest of the Company, hence, is identified as a Related Party.
- 3.2 “**Control**”, including the terms controlling, controlled by and under common control with, means the possession directly or indirectly of the power to direct or cause the direction of the management and policies of a person, whether through the ownership of voting securities by a contract other than a commercial contract for goods or non-management services or otherwise. Control shall be presumed to exist if any person directly or indirectly owns, controls or holds with the power to vote forty percent (40%) or more of the voting securities of any other person, provided, that no person shall be deemed to control another person solely by reason of his being an officer or director of such other person.
- 3.3 “**Close Family Members**” are persons related to the Company’s directors, officers and stockholders (“**DOS**”) within the second degree of consanguinity or affinity, legitimate or common-law. These shall include the spouse, parent, child, brother, sister, grandparent, grandchild, parent-in-law, son-/daughter-in-law, brother-/sister-in-law, grandparent-in-law, and grandchild-in-law of the Company’s DOS.

- 3.4 **“Corresponding Persons in Affiliated Companies”** are the DOS of the affiliated companies and their Close Family Members.
- 3.5 **“RPTs”** are transactions or dealing with Related Parties of the Company, including its trust department, if any, regardless of whether or not a price is charged. These shall include, but are not limited to the following:
- a. on- and off-balance sheet credit exposures and claims and write-offs;
  - b. investments and/or subscriptions for debt/equity issuances;
  - c. consulting, professional, agency and other service arrangements/contracts;
  - d. purchases and sales of assets, including transfer of technology and intangible items (e.g. research and development, trademarks and license agreements);
  - e. construction arrangements/contracts;
  - f. lease arrangements/contracts;
  - g. trading and derivative transactions;
  - h. borrowings, commitments, fund transfers, and guarantees;
  - i. sale, purchase, or supply of any goods or materials; and
  - j. establishment of joint venture entities.

RPTs shall be interpreted broadly to include not only transactions that are entered into with Related Parties but also outstanding transactions that were entered into with an unrelated party that subsequently becomes a Related Party.

- 3.6. **Third Party Provider (“TPP”)** - is any person, company, contractor, consultant or firm, whether or not a member of the Prudential Group, with whom the Company has entered into a contract for the supply of goods or services. This may also include vendors, lessors, affiliates and direct invested counterparties of the Company.
- 3.7. **“Officers”** pertains to Company officers with a position of at least Vice President.

#### 4. Guidelines in Ensuring Arm’s Length Terms

RPTs shall be conducted in the regular course of business and not undertaken on more favorable economic terms (e.g. price, commissions, interest rates, fees, tenor, and collateral requirement) to such Related Parties than similar transactions with non-related parties under similar circumstances.

The Company adopts the Group Inter-Company Invoicing and Settlement Policy on general provision of inter-company balances and settlement. The inter-company balances cover all receivables/payables that arise during operations when services/products are rendered by other entities within the Prudential Group. Issuance of the invoices should be supported by sufficient documents that are able to show the agreement and rationale of the inter-company charges. This agreement shall be in the form of a written and signed agreement between the parties establishing the agreement. Any agreement reached should be fully documented.

A mutual consensus shall be established between the creditor (the Local Business Unit who provides services to the others) and the debtor (the Local Business Unit who receives the services). Both debtor and creditor shall agree on the terms and conditions of the services before they are provided. In addition, establishing a mutual consensus is critical for the transfer pricing process (intercompany pricing arrangements between related business entities) to determine the factual nature of the transaction(s) between parties, which can be required by local tax authorities when reviewing the Company's transfer pricing strategy.

An effective price discovery mechanism shall be put in place to ensure that transactions are engaged into at terms that promote the best interest of the Company and its stakeholders. The price discovery mechanism may include, but are not limited to,

- (a) the validation procedures to determine the nature, components, and price of the services to be provided,
- (b) acquiring the services of an external expert, and
- (c) where applicable: opening the transaction to a bidding process, canvassing, or benchmarking, or
- (d) any other applicable due diligence procedures.

The Procurement Policies and Guidelines are aligned with the due diligence requirements of this Policy. Note however that local price checking for all material RPTs should still be performed.

## **5. Conflicts of Interest**

Conflict of interest is "a situation in which a relevant employee, member of the Board, or a stockholder has a private or personal interest sufficient to influence, or appear to influence, the objective exercise of his or her official duties" in connection with the Company's business.

The Company adopts the Group Conflict of Interest Policy. It is committed to ensuring that all related parties operate to the highest level of integrity in all their dealings and business relationships, either within or outside the Company.

The members of the Board, stockholders, and management, specifically Company Officers with a position of at least Vice President, shall disclose to the Board, at least once a year, whether they directly, indirectly or on behalf of third parties, have a financial interest in any transaction or matter affecting the Company.

Directors and officers with personal interest in the transaction shall abstain from the discussion, approval and management of such transaction or matter affecting the Company.

## **6. Materiality Thresholds and Excluded Transactions**

Materiality threshold shall be set for each type of transaction and for each related party group, depending on the nature of business transaction or value impact that could result in business interruption, has business consequences or causes concern to Management such that it warrants escalation and notification to Management.

Materiality shall not only be based on the amount but on the nature of the transaction and risks involved which would lead to any of the following:

- a. Material impairment of the quality of the Company's governance;
- b. Significant increase in the Company's operational risks.

Excluded transactions are those transactions that are operational in nature which do not place the Company at risk or create any liability.

Considering the above, the following are considered material RPT transactions:

- a. Transactions or arrangements that are considered critical based on the existing Vendor Management Framework, OR
- b. If the transaction is non-critical, but the amount of the transactions exceeds 1% of prior year's admitted assets as submitted to the Insurance Commission. Amount of transaction shall apply to contract amounts, OR year-to-date transactions OR amount balance, whichever is higher.

All material RPTs, those that cross the materiality threshold, and write offs of material exposures to related parties shall be subject to the approval of the Board of Directors and confirmation by majority vote of stockholders in the annual stockholders' meeting.

## **7. Internal Limits for Individual and Aggregate Exposures**

In addition to existing prudential limits which shall be complied with at all times, the Company shall include internal limits or sub-limits for individual and aggregate exposures to a Related Party and for aggregate exposures to all Related Parties that are consistent with the Company's risk appetite, risk profile, and capital strength. The internally-set limits shall be tied in with the Company's internal definition of capital.

Breaches in limits shall be reported to the Board with the decision of the Board to accept exposure or to take steps to address the breaches as may be necessary, duly documented in the minutes of meetings.

Considering the above, the total contracts OR transactions in any given year OR the total balance of the account, with any one Related Party, whichever is higher, shall not exceed the following Company's internal limits:

For Each Related Party:

- (a) For bond and equity investments, this shall be 11% of prior year's admitted asset;
- (b) For other items, this shall be 1% of prior year's admitted asset; this category shall include, among other things, transactions arising from fund management services, advances, etc.

In the aggregate, the limit to all Related Parties shall be 14% of prior year's admitted asset. The prior year's admitted asset shall be based on what was reported to the Insurance Commission.

**8. Whistleblowing Mechanisms**

Employees are encouraged to communicate, confidentially and without risk of reprisal, legitimate concerns about illegal, unethical or questionable RPTs. For concerns and complaints, employees may report on the contact details below.

Head Office Address: 9/F Uptown Place Tower 1, 1 East 11th Drive, Uptown Bonifacio, 1634 Taguig City, Metro Manila, Philippines

Telephone numbers: From an outside line dial (connection is only available through the two carriers 'Smart' and 'PLDT')

Philippines.....1800 1 322 0285

Website: [www.prudentialspeakout.ethicspoint.com](http://www.prudentialspeakout.ethicspoint.com)

**9. Restitution of Losses and Other Remedies for Abusive RPTs**

This policy shall comply with the applicable regulatory requirements and the Group Code of Business Conduct. These standards must be applied in all dealings with employees, customers, shareholders, suppliers, competitors, the wider community and the environment. It is also mandatory to adhere to local regulatory requirements. However, where the Group Code imposes more stringent standards than local requirements, then the Group Code must be applied and complied with.

When an abusive RPT transaction is confirmed after a thorough investigation and review, all profits gained by Related Parties out of such abusive RPT transactions, and all losses suffered by the Company, shall be refunded or restituted in full to the Company with legal rate of interest computed from the time profits accrued to the Related Party or from time the Company incurred the loss.

RPTs which are found after review and investigation to not be at arm's length or not on normal commercial terms, shall be terminated subject to restitution as provided in the preceding paragraph.

Officers, directors, and employees who have been remiss in their duties in handling RPTs shall be subject to disciplinary measures in accordance with the **Company's Code of Discipline** and relevant corporate governance policies, without prejudice to the applicable legal remedies which the Company may avail.

## **10. Roles of Senior Management and Self-Assessment Functions**

### Board of Directors and RPT Committee

The roles of the BOD and RPT Committee are detailed in the Board Charter and RPT Committee Charter. Please refer to Annexes D and E. The Board of Directors shall be the final approving authority of all material RPTs including any renewal or material changes in the terms and conditions of material RPTs. The following shall require prior RPT Committee endorsement and BOD approval:

- i. Transactions which the BOD may determine as posing significant risk or potential abuse to the Company;
- ii. Transactions with total contract amount of Php300,000,000.00 for Other Items per Affiliate;
- iii. All write-offs of material exposures with RPTs;
- iv. Breaches in internal limits;
- v. The RPT Policy and its amendments; and
- vi. All RPTs requiring prior regulatory approval.

The RPT Committee and the BOD may approve or disapprove the transaction or provide modifications to approved RPTs.

For endorsements and approvals of urgent transactions requiring prior RPT Committee endorsement and BOD approval, the RPT Committee may meet at such other times as determined by a majority of its members or by the Board.

### Senior Management, Internal Audit, and Compliance

1. The Executive Committee, through the Chief Financial Officer (CFO), shall implement appropriate controls to effectively manage and monitor RPTs on a per transaction and aggregate basis. Exposures to related parties shall also be monitored on an ongoing basis to ensure compliance with the company's policy and IC's regulations. Please refer to Annex G for details on the functional roles.
2. The CFO or Financial Controller shall ensure completeness and accuracy of information and disclosure so that the RPT Committee, and eventually, the Board of Directors, shall have sufficient information in carrying out their functions over the RPTs. For reports to be submitted to regulating and supervising authorities, the CFO or Financial Controller may submit these directly to the said authorities, subject to review and ratification by the RPT Committee. The CFO or Financial Controller shall ensure, via the Finance function, that all

- reportable RPTs are completely identified. All updated Conflict of Interest (COI) Disclosures (from BOD, Officers, Shareholders, Employees, Distribution Partners and Third Party Providers) shall be compiled and must be cross-checked to ensure completeness. All reportable RPTs must be tracked on a quarterly basis. An analysis of vendor expenses, at least once a year, shall be reported to the RPT Committee, to highlight any unusual concentration of vendor utilization. This analysis shall further ensure completeness of the reportable RPTs.
3. The Executive Committee shall approve all RPTs that are below the materiality threshold, subject to confirmation by the Board of Directors. All decisions by the Executive Committee must be properly recorded in the minutes of the meetings.
  4. The Internal audit function shall conduct a periodic formal review of the effectiveness of the company's systems and internal controls governing RPTs to assess consistency with the Board-approved policies and procedures. The resulting audit, reports, including exceptions or breaches in limits, shall be communicated directly to the Audit Committee.
  5. The Compliance function shall ensure that the Company complies with relevant rules and regulations and is informed of regulatory developments in areas affecting related parties. It shall aid in the review of the Company's transactions and identify any potential RPT that would require review by the Board or RPT Committee. It shall ensure that the RPT Policy is kept updated and is properly implemented throughout the Company.
  6. The RPT Committee shall review the RPT Policy at least once annually, recommending any changes it considers necessary to the Board for approval. The RPT Policy shall be publicly available and posted on Pru Life UK's website.

## **11. Disclosure and Regulatory Reporting**

The Company shall adequately disclose in its Annual Report, if applicable, the overarching policies and procedures for managing RPTs, including managing of conflicts of interest or potential conflicts of interest; responsibility of the RPT Committee; nature, terms and conditions, as well as original and outstanding individual and aggregate balances, including off-balance sheet commitments, of material RPTs.

Also, the Company shall report all entities in the conglomerate structure where it belongs (Annex A). The said structure shall likewise disclose beneficial owners of shareholdings that are in the name of PCD Nominee Corporation. The said report shall be submitted to the IC within thirty (30) calendar days after the end of every calendar year.

Likewise, the Company shall submit a report on material exposures to Related Parties, which shall include the material RPTs of their non-financial subsidiaries and affiliates, (Annex B) within twenty (20) calendar days after the end of the reference quarter. Supervised non-financial subsidiaries and affiliates are therefore expected to report their material RPTs to the parent CI, which in turn shall report the same to IC.

The prior written approval of the Insurance Commissioner (IC) shall be secured for transactions between the Company and any person in its holding company system for sales, purchases, exchanges, loans, or extensions of credit, or investments involving 5% or more of the Company's admitted assets as of the thirty-first (31<sup>st</sup>) day of December of the preceding year.

Moreover, the following transactions between the Company and any person in its holding company system may not be entered into unless the Company has notified the Commissioner in writing of its intention to enter into such transaction at least thirty (30) days prior thereto, or such shorter period as he may permit, and he has not disapproved it within such period:

- (1) Sales, purchases, exchanges, loans or extensions of credit, or investments, involving more than one-half of one percent ( $\frac{1}{2}\%$ ) but less than five percent (5%) of the Company's admitted assets as of the thirty-first (31<sup>st</sup>) day of December of the preceding year;
- (2) Reinsurance treaties or agreements;
- (3) Rendering of services on a regular or systematic basis; or
- (4) Any material transaction, specified by regulation, which the Commissioner determines may adversely affect the interest of the Company's policyholders or stockholders or of the public.

The above requirements shall be applied as follows:

<p><b>Sales, purchases, exchanges, loans or extensions of credit, or investments, involving five percent (5%) or more of the insurer's admitted assets</b></p>	<p><b>Sales, purchases, exchanges, loans or extensions of credit, or investments, involving more than one-half of one percent (1/2%) but less than five percent (5%) of the insurer's admitted assets</b></p>
<p>a. Request for Approval. - Must request for the approval of the IC in writing at least forty-five (45) days prior to the intended date of transaction.</p> <p>b. Contents of the Request. - The request for approval must clearly and accurately disclose the details of the proposed transaction and must include all the material information as required under Section 298 of the Amended Insurance Code.</p> <p>c. Review by the Commissioner. Upon submission of the requirements, the proposed transaction will be reviewed by the Insurance Commissioner or his duly authorized representative.</p> <p>d. Approval by the Commissioner. - If the Commissioner finds that the proposed transaction complies with the requirements under Section 298</p>	<p>a. Written notification - Must notify the IC in writing at least thirty (30) days prior to the intended date of transaction.</p> <p>b. Contents of the Notification. - The written notification must clearly and accurately disclose the details of the proposed transaction and must include all the material information as required under Section 298 of the Amended Insurance Code.</p> <p>c. Review by the Commissioner. Upon submission of the requirements, the proposed transaction will be reviewed by the Insurance Commissioner or his duly authorized representative within thirty (30) days from receipt of the written notification by the Commission.</p> <p>d. Reckoning Period. - The thirty (30) days period shall be reckoned from</p>

<p>of the Amended Insurance Code and that it will not adversely affect the interests of policyholders, written approval for the proposed transaction will then be issued to the controlled insurer.</p>	<p>the time the written notice is officially received by the Commission.</p> <p>e. Approval/Disapproval by the Commissioner. - If the Commissioner finds that the proposed transaction does not comply with the standard set forth in Section 298 of the Amended Insurance Code and that the interests of the policyholders will be adversely affected, a written disapproval may be issued to inform the controlled insurer. On the other hand, if no written disapproval is issued by the Commissioner within the thirty (30) day period, the proposed transaction is deemed approved.</p>
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A summary of reporting requirements and approval process are detailed out in Annex C for ease of reference.

## 12. ANNEXES

For ready reference, the following documents are attached:

Annex A: IC Template: Report to IC on Conglomerate Structure



Pru Life UK -  
Conglomerate Struc

Annex B: IC Template: Report to IC on Material RPTs



Pru Life UK -  
Material RPT Templa

Annex C: High-Level Roles and Reporting Requirements



Pru Life UK - Roles  
and Reporting Requir

Annex D: BOD Charter



Pru Life UK - Board  
Charter.pdf

Annex E: RPT Committee Charter



Pru Life UK -  
Revised RPT Commit

Annex F: IC Circular on RPT



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Annex G: Details on Functional Roles



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Functional Roles.docx