

## **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 and addressed in a timely manner, Pru Life UK adheres to the Prudential Group's Anti-bribery and Corruption Policy, the Prudential Corporation Asia ("PCA") Confidential Helpline Policy and its own 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. Prudential Group's Anti Bribery and Corruption Policy***

<http://www.prudential.co.uk/site-services/governance-and-policies/anti-bribery-and-corruption-policy>

Prudential 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 out a clear Anti Bribery & Corruption policy;
2. training employees so that they can recognise and avoid the use of bribery by themselves and others;
3. encouraging its employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
4. rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution; and
5. taking firm and vigorous action against any individual(s) involved in bribery.

Prudential plc absolutely forbids corruption and the paying or receipt of bribes for any purpose.

Bribery - Bribery is the offering, promising, giving, solicitation or the receipt or agreement to receive any financial or other advantage, or any other inducement from any person or company, (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 another's behalf.

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

The Group prohibits:

Bribery of or by any person or company, in any jurisdiction, wherever they are situated and whether they are a public official or body or private person or company or by any individual employee, agent or other person or body acting on the Group's behalf in order to

1. gain any commercial, contractual or regulatory advantage for the Group in a way which is unethical;
2. gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual; or
3. induce the improper performance of any function that is of a public nature, connected with a business, performed by a body or performed by a person in the course of their employment.

## **II. PCA Confidential Helpline Policy**

The PCA Confidential Helpline is a mechanism that allows employees and agents of Pru Life UK to escalate matters of concern that is independent of line management. 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.

These concerns which should be reported include but are not restricted to:

1. Questionable accounting or auditing matters
2. Financial regularities
3. Fraud
4. Bribery
5. Corruption
6. Harassment
7. Victimization
8. Compliance breaches
9. Health and safety breaches
10. Information security breaches
11. Any suspicion of malpractice, however large or small it may appear to be

All employees and agents of PCA companies (including Pru Life UK) may contact the PCA Confidential Help Line through telephone, email, letter, facsimile, or in person.

### **Prohibition Against Retaliation**

1. PCA Companies (including Pru Life UK) will not discharge, threaten, suspend, reprimand, harass, discipline, withhold or suspend payment of salary and/or benefits, demote, transfer or otherwise take any disciplinary or retaliatory action related to the terms and conditions of employment against anyone for making any appropriate call to the PCA Confidential Help Line.
2. Any reports of possible unfavourable treatment of callers to the PCA Confidential Help Line will be reported to the Group and PCA Audit Committees.

### **Procedure**

1. It is not necessary for anyone who contacts the PCA Confidential Help Line to give their name or contact details, although this may affect the efficacy of the investigations

carried out in response to the contact. Each message to the PCA Confidential Help Line, including the name of the contact if given, will be treated as confidential, to the extent that is reasonably possible in the light of PCA's need to investigate the issue.

2. The PCA Confidential Help Line Officer will conduct an initial investigation.
3. If the PCA Confidential Help Line Officer determines following the initial investigation that a full investigation is required, an investigation team shall be appointed to carry out said investigation. Where necessary, Group Security or other specialist investigators will be engaged to assist these investigations.
4. Corrective action shall thereafter be taken depending on the outcome of the investigation.

### **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 employee 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.