

## **ANTI-BRIBERY AND CORRUPTION POLICY**

### ***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.

Pru Life UK, a subsidiary of British financial services giant Prudential plc, has adopted the Anti-bribery and Corruption Policy of Prudential plc. Pursuant to thereto, Pru Life UK implements the following mandatory activities:

1. all departments of Pru Life UK must keep a gifts and entertainment register (GER) to record gifts given to and received from external parties;

2. all employees must annually execute the Anti-Bribery Self Certification Form; and
3. all employees must pass the annual refresher course on the Anti-Bribery and Corruption Policy.