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# Document Overview

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This document is designed to help Prudential in the selection of relevant Questions & Answers to be implemented in the Web Intake Site as a resource guide. Please consider that these questions need to be customized in order to reflect Prudential current state of practices.

## CONSIDERATIONS

- Provide answers to frequently asked questions
- Provide best practice recommendations

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## About the Speak Out hotline and website

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### WHAT IS SPEAK OUT?

Speak Out is a confidential channel through which you can ask questions and raise concerns about ethics, compliance or Prudential Group's Code of Business Conduct. It is provided by Prudential Group but operated by an external, independent specialist firm called NAVEX. NAVEX operate the webpages and the hotline through which you may raise a concern, as well as the database in which the personal data and information that you report are stored. NAVEX and their resources assist management and employees in working together to address a large amount of issue types in the workplace in an effort to promote a safe and positive work environment.

With Speak Out you can raise a confidential concern via either a local freephone hotline number in a language of your choice, or report it via the Internet – again in a language of your choice.

### WHY DO WE NEED A REPORTING SYSTEM LIKE SPEAK OUT?

The Prudential Group is committed to fostering a culture of openness, honesty and accountability and requires the highest possible standards of professional and ethical conduct of itself and from all employees. Consequently, it is fundamental that any genuine concerns which you may have about suspected misconduct within the business are aired. It is clearly in all our interests to ensure that any misconduct does not occur and you are therefore positively encouraged to Speak Out about any concerns you may have about any forms of misconduct.

Each of us has an obligation to promote a safe, positive and ethical work environment at Prudential. By working together, we can maintain a healthy environment for all employees in every business and in every geography.

### WHAT TYPES OF CONCERNS SHOULD I RAISE?

Concerns which should be reported include, but are not restricted to:

- Accounting and Auditing Matters - The unethical systematic recording and analysis of the business and financial transactions associated with generally accepted accounting practices. (Examples include: misstatement of revenues, misstatement of expenses, misstatement of assets, misapplications of GAAP principles, wrongful transactions.)
- Anti-Bribery or Corruption - The act of influencing the official or political action of another by corrupt inducements which may include giving items that could be reasonably interpreted as an effort to improperly influence a business relationship or decision.
- Money Laundering & Terrorist Financing - Avoiding the internal prevention procedures. In addition to any local requirement to submit a Suspicious Activity Report, where normal prevention procedures are inappropriate or inadequate, you should also consider Speaking Out. The definition of a Suspicious Activity depends on the type of business,

- occupation or profession of the conductor or account owner, and the volume or frequency of the transactions that are made. It is not limited to commercial transactions.
- Cybersecurity and Data Breaches – Knowledge or awareness of activity that could result in a cyber attack on Prudential information systems, data or employees whether relating to an external or internal threat actor
  - Discrimination, Harassment or Unfair Treatment - Discrimination, harassment, bullying and other types of misconduct where the behaviour is contrary to Prudential's values and standards
  - Fraud - Examples include: bookkeeping errors, embezzlement, misapplication of funds, and mishandling of cash
  - Falsification of Contracts, Reports or Records - i.e. altering, fabricating, falsifying, or forging all or any part of a document, contract or record for the purpose of gaining an advantage, or misrepresenting the value of the document, contract or record.
  - Privacy – Misuse of Prudential information, particularly where it relates to personal information that could be used to identify an individual, for a purpose other than the information was originally obtained (e.g., use of customer information for personal gain)
  - Sabotage or Vandalism - Destruction of an employer's property (as tools or materials) or the hindering of manufacturing by discontented workers (Examples include: Equipment destruction, stealing, work slowdown, computer virus)
  - Substance Abuse - the misuse of both legal and illegal drugs including alcohol. (Examples include: cocaine, narcotics, marijuana, stimulants)
  - Theft - The act of stealing; specifically: the taking and removing of personal property with intent to deprive the rightful owner of it.
  - Violence or Threat – defined as an expression of the intention to inflict evil, injury, or damage to a person or their property. (Examples include: direct, veiled, conditional, violent)
    - Knowledge of another person deliberately facilitating, enticing or Deliberately concealing any of the above
  - Victimisation, or retaliation against someone raising a concern
  - Breaches in Health & Safety regulation or legislation and/or unsafe working conditions • Damage to the Environment - Examples may include: Water pollution, land contamination and damage to biodiversity
  - Insider trading - the buying or selling of a security by someone who has access to material, non-public information about the security
  - Misconduct or inappropriate behaviour (no matter how small, or trivial)
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## Raising a Concern

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### HOW DO I RAISE A CONCERN?

You have a number of avenues available to you to raise a concern:

- Your manager or supervisor;
- Your local Human Resources department;
- Any member of management, or a local (this will vary by BU) dedicated management contact i.e. HR, Legal, Compliance;

- The Speak Out freephone hotline or web reporting system operated independently by NAVEX on behalf of the Prudential Group.

If you elect to use Speak Out, you can raise your concern online using this website. If you prefer, you can call your locally advertised hotline number where you will be helped to raise your concern by an independent specialist in the language of your choice.

Prudential's employees, clients, subcontractors, agents and suppliers are encouraged to use Speak Out to raise any genuine concerns.

## WHO IS IN CHARGE OF RUNNING SPEAK OUT?

Speak Out is run by NAVEX, a third-party supplier that specializes in Ethics & Compliance programs such as this. This set-up ensures maximum confidentiality, as reports are stored on a database outside the Prudential Group environment. Furthermore, in order to ensure anonymity and confidentiality, the call center does not use any recording devices or simulated electronic voice greetings. Incoming calls are not subject to Caller ID screening. It is not NAVEX's role to address the concern itself.

## ARE THERE ANY LEGAL RESTRICTIONS ON WHO CAN RAISE A CONCERN?

In some countries, local regulations govern who is allowed to report an incident or the nature of the incident you can report. If this is the case in your country, you will be informed about this when you use Speak Out.

## I DO NOT SPEAK ENGLISH. CAN I EXPECT TO BE ANSWERED IN MY LOCAL LANGUAGE?

Speak Out offers a truly global service. When you call the freephone line you will be greeted by a recorded message in the language of the country you are dialing in from. While you listen to this, a professional translation service will be dialed into the call so that your concern can be translated to the NAVEX call handler. The Speak Out website is also available in over 12 languages.

## WHAT IF THE SITUATION I AM REPORTING IS AN EMERGENCY?

Concerns about an immediate threat of physical harm or damage to property should **not** be reported to Speak Out. Instead, please contact your local emergency services.

## WHAT IF I REMEMBER SOMETHING IMPORTANT ABOUT THE INCIDENT AFTER I HAVE RAISED A CONCERN? OR WHAT IF THE PERSON IN CHARGE OF THE REPORT HAS FURTHER QUESTIONS FOR ME?

If you file a report via Speak Out, you will be given a unique user name and asked to choose a password. You can return to Speak Out again either via the internet or by telephone to access the original report and add more details that will help resolve open issues or to answer questions posed by a company Investigator. The Investigator may, where practicable, also be able to provide you with updates on the investigation and even the outcome. We therefore strongly recommend that you return to the site within the time specified to answer any follow up questions the Investigator might have that will help them investigate the concerns you raise. All correspondence is held in the same strict confidence as the initial report.

## WHAT IF I HAVE LOST MY UNIQUE USER NAME AND PASSWORD?

The unique user name and the password are unique and cannot be retrieved for security purposes. If you have lost them but need to add additional insights to your previous report, we encourage you to create a new case and mention that it is related to a previous one.

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## Confidentiality

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## HOW DOES PRUDENTIAL HANDLE THE CONCERN I RAISE?

Ethics concerns are reported either online or via phone through Speak Out. The Group Director of Global Investigations is notified of all reports. The Group Director of Global Investigations forwards reports to the appropriate Investigator. In accordance with local regulations and processes, an investigation will be conducted. All investigations will be conducted in an objective, timely and thorough manner.

## WHAT HAPPENS WHEN I RAISE A CONCERN?

Once you have finalised a report online or by phone, all the information given is entered directly into a secure database server in order to prevent any possible breach of security. The server will be located in Germany, ensuring the application of all applicable EU laws regarding data and privacy protection. For the purpose of processing your report and conducting investigations, your personal data and information is accessible on a strictly need-to-know basis. Only the appropriate Investigator within Prudential can access this information. Information relating to the alleged breach, including your identity or the identity of other persons involved in an inquiry or investigation, may only be disclosed to specific persons holding functional roles within the Prudential Group that have a need to know (i.e. Group Investigations, Legal, Internal Audit/Audit

Committee, or outside Prudential (i.e. Legal Counsel, Forensic investigators/auditors, law enforcement) who require this information to ensure compliance with the legal or regulatory obligations, or as input for subsequent judicial proceedings.

## WHAT IF MY BOSS OR OTHER MANAGERS ARE INVOLVED IN THE CONCERN I RAISE? IS IT POSSIBLE THEY WILL FIND OUT THAT I HAVE RAISED A CONCERN?

Speak Out and its reporting and investigation methods are designed so that implicated parties are not notified or granted access to reports in which they have been named.

## DO I HAVE TO REVEAL MY IDENTITY?

Reports to Speak Out can be submitted on an anonymous basis, on condition this is permitted by local law, although this can make it more difficult to support a comprehensive approach to the related concern. We therefore encourage you to identify yourself to allow for a more productive and efficient assessment of the situation. Please be assured that the information provided by you will be treated confidentially.

A report submitted from any computer, land line phone or cell phone will remain secure. An Internet portal never identifies a visitor by screen name and Speak Out is designed to eliminate internet addresses. Technical anonymity will be maintained no matter how you submit a report. Note: Please consider that the anonymity feature may not be available in certain countries due to local regulations. In this event, the ability to remain anonymous will not display.

## HOW CONFIDENTIAL IS THE CONCERN I RAISE?

NAVEX does not generate or maintain any internal connection logs with IP addresses. There is therefore no information available to link your PC to the use of Speak Out. In fact, NAVEX is contractually bound not to try and identify a reporter.

Any incident you report from home, from a neighbour's computer, or from any internet portal will remain secure and anonymous. An internet portal never identifies a visitor by screen name and the NAVEX system strips away internet addresses so that complete anonymity is always guaranteed.

If you report an incident to Speak Out, the following personal data and information will be requested:

- Your name and your contact information (unless you choose to report anonymously);
- Whether you are employed by Prudential or affiliates;
- The name and Company location of the person(s) you name in your report (if you include such information to enable an effective investigation); and
- A factual description of the misconduct as well as a description of the circumstances surrounding the incident.

## HOW IS THE PERSONAL IDENTIFIABLE INFORMATION PROTECTED?

Prudential uses NAVEX's Solutions to support the administration of Speak Out. This solution is hosted on NAVEX's secure servers and is not part of Prudential's website or Intranet.

The personal data you provide will be kept as long as it is necessary to process your report (including any investigations by the competent department), or, if applicable, as long as it is necessary to initiate sanctions or if the data needs to be kept for legal reasons.

## HOW EXACTLY WILL PERSONAL IDENTIFIABLE INFORMATION BE PROCESSED AFTER I HAVE REPORTED AN INCIDENT AND WHO MAY ACCESS THESE FILES? WILL A PERSON SUBJECT TO A REPORT BE NOTIFIED?

For the purpose of processing your report, personal data and information may be accessed, processed and used by the appropriate Investigator, or by technical staff at NAVEX. If necessary, personal data and information may be disclosed by Prudential to the police and/or other enforcement or regulatory authorities.

Please note that any person that you report via Speak Out may be notified at an appropriate time that a report has been filed. Your identity will not be disclosed. However, any person that you report is entitled to correct your description of the relevant circumstances giving rise to your report. According to the Data Privacy regulations, we will inform this person about:

- The Prudential entity responsible for operating the Ethics Line;
- The facts of the allegation(s) against him/her;
- The persons or departments that may receive information or reports related to the allegation; and
- How s/he can exercise any applicable rights to access and correct personal data and information.
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If providing this person with certain information will constitute a breach of the rights of others, s/he will not receive this information unless we are legally obliged to provide it.

## AM I PERSONALLY AT RISK IF AN ANONYMOUS CALLER MAKES UNFOUNDED ALLEGATIONS AGAINST ME? WHAT IF I HAVE CONCERNS ABOUT RETALIATION?

All concerns that are submitted via Speak Out are investigated with due care to establish whether or not the concern is substantiated. Action will only be taken if an allegation proves to be justified; you do not need to worry about being personally at risk if the allegations are unfounded.



Prudential strictly forbids retaliation against employees for submitting a genuine concern to the company. Report made in good faith will not expose you to any sanctions, regardless of whether the underlying facts prove to be correct or result in any corrective action. If you believe you have been subjected to retaliation for your report, please report it to Group Investigations or through Speak Out so that we may investigate and take appropriate action. Employees who knowingly provide false or misleading information to the Company may be subject to discipline.

## WHAT IF I FEEL I AM BEING VICTIMISED AS A RESULT OF RAISING A QUALIFYING SPEAK OUT CONCERN?

Victimisation is a form of detriment that may occur as a result of raising a Speak Out concern. Attempts to identify those who raise Speak Out concerns may lead to victimisation and distress for the reporter of a concern. Failing to maintain confidentiality of a reporter's identity may itself constitute a detriment.

Examples of Detriment include:

- Pressure to resign; advertising the reporter's job whilst disclosure reporter still holds the position.
- Damage or injury to a reporter, including psychological damage.
- Detriment also includes the threat of detriment, so any threat that puts a reporter at a disadvantage constitutes detrimental action.

If you feel you have been subjected to victimization or detriment as a result of raising a concern through Speak Out, you should share your concerns with those investigating your concerns or with the Group Director of Global Investigations.