



# M&G plc Speak Out Guidelines (Poland)

## 1. PURPOSE

M&G plc's "Speak Out" whistleblowing programme encourages and enables you to raise any concerns or suspicions you may have about a risk, misconduct or any wrongdoing that could affect our customers, the public, other colleagues, or the company itself.

## 2. HOW DO I REPORT A CONCERN?

It is important that you always feel able to raise any concerns you may have.

M&G uses an independent company, NAVEX, to provide a confidential service for receiving Speak Out reports. NAVEX provides 24/7 web and telephone reporting in multiple languages. This service also enables you to make enquiries and to communicate confidentially with our dedicated internal Speak Out team.

Concerns or suspicions relating to inappropriate conduct and wrongdoing (that have occurred, are ongoing, or are likely to occur) can be raised in confidence via the following channels:

- Free hotline: 800-005-005
- EthicsPoint website where a report can be made electronically/in writing by completing a special form: <https://secure.ethicspoint.eu/domain/media/pl/gui/105606/index.html>
- Postal mail to Prudential's address in Poland (ul. 182 Puławska, 02-670 Warszawa) – in this case, please make a visible marking on the envelope that the mail is confidential and concerns Speak Out or a whistleblower's report so that it is not opened by an unauthorized person;
- Physical meeting – the intention of such a meeting can be reported through the EthicsPoint website, hotline or through a request filed with the Head of the Legal and Compliance Department at Prudential.

use any of these channels to raise a concern confidentially in Polish.

A "Speak Out" icon is added to the desktop of all colleagues when they join M&G, enabling a quick and simple way to access the Speak Out team's intranet page. We recommend this is pinned to the Taskbar.

**Important note:** Once you submit your report through EthicsPoint online or by using the Freephone hotline, you'll be issued with a Report Key and you will need to choose a password. Please make a note of these and keep them in a safe place as you will need them when returning to the site for updates on your case. By using this method, we can ensure that you will remain completely anonymous when we need to communicate with you.

## 3. CONFIDENTIALITY

All information is held securely and your confidentiality will be protected to the maximum extent that the law permits. You should also treat any information relating to the concern as strictly confidential.

The ways we protect your confidentiality include:



- Storage of all case-related information in a secure, restricted access folder which is only accessible by authorised members of the Speak Out team and on a need-to-basis authorized members of Compliance Team in Poland.
- Strict limits on the number of persons who can have access to reports, and requiring training and additional non-disclosure agreements for those persons.
- Allowing information to be disclosed only when necessary for an investigation.
- Requiring third parties who deal with Speak Out reports, e.g., external Legal advisers, to enter into agreements so that data is adequately and properly processed.
- Ensuring any requests for information that are received under Data Protection laws (e.g. a Data Subject Access Request or “DSAR”) are referred to the Data Privacy Team for consideration and/or application of a suitable exemption of whistleblowing information from processing and disclosure in order to preserve confidentiality

## **4. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS**

### **3.1 MONITORING AND OVERSIGHT**

The M&G plc Audit Committee is responsible for the oversight and implementation of the Whistleblowing Policy and the effectiveness of the Speak Out programme on behalf of the M&G plc Board. Both the Policy and programme are reviewed at least annually.

#### **3.1.1 Whistleblowers’ Champion**

The operation and integrity of our Speak Out programme is overseen by a Whistleblowers' champion, a non-Executive director who sits on the M&G plc board. The Whistleblowers' champion is responsible for ensuring and overseeing the integrity, independence and effectiveness of Speak Out and meets regularly with the Speak Out team to ensure that:

- the whistleblowing processes and arrangements in place are working and are effectively communicated to all colleagues.
- the Speak Out team operates with independence and integrity
- all disclosures are treated fairly and consistently
- the organization protects whistleblowers from being victimised because they have disclosed reportable concerns.

#### **3.1.2 Whistleblowing Operations Manager**

The Whistleblowing Operations Manager has day-to-day operational responsibility for the Speak Out programme and ensures that all managers and other members of the Speak Out team who may deal with concerns or investigations under these guidelines receive regular and appropriate training.

#### **3.1.3 Your Responsibility**

All colleagues are responsible for the success of the Speak Out programme and should ensure that they use it to disclose any risks, suspected misconduct or wrongdoing. Colleagues are welcome to comment on these



guidelines and suggest ways in which they might be improved. Comments, suggestions and queries should be addressed to the Whistleblowing Operations Manager at the address below.

If you are uncertain whether someone or something is within the scope of these guidelines, you should seek advice from the Whistleblowing Operations Manager.

The Whistleblowing Operations Manager can be contacted at: [mandgspeakout@mandg.com](mailto:mandgspeakout@mandg.com)

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