

PruBSN Gift & Hospitality (G&H)

In PruBSN, we allow the exchange or provision of modest G&H that may foster goodwill in business relationships. However, it must be strictly limited in value and frequency, in keeping with customary business practice and in accordance with all applicable laws and company policies. Gifts & Hospitality (G&H) include, but are not limited to, items of value, a meal, invitation to a show or sporting event, travel related expenses or a combination of any of these.

Definition

- **“Gift”** : An object or item of value given to a person or persons apart from Hospitality as defined below, in recognition of an event, or special occasion but not routinely given without a clear purpose.
- **“Hospitality”** : Provision of meals, entertainment, travel, or accommodation.

Key Considerations

- Employees must not request, accept, offer or provide gifts or hospitality designed to induce, support or reward improper conduct including in connection with any business or anticipated future business involving Prudential: for example, where they might be seen to compromise the receiver’s judgement and integrity. This requirement extends to the provision or acceptance of gifts or hospitality through any third parties or to or by members of the family of an employee of an actual or a potential customer.
- G&H must not be used to influence, or appear to influence, external parties or encourage favouritism for discharging of services or improper actions of another party;
- In general, gifts with no material value or benefit (e.g. complimentary items such as pens, diaries, clothing) are allowed; and
- There are certain restrictions and prohibitions when dealing with Government Officials.

G&H that is not acceptable

- G&H that is indecent, inappropriate or would damage Prudential’s integrity or reputation;
- G&H that breaches any local law or regulation;
- G&H that the recipient is not permitted to receive by their employer/principal;
- Where employees personally pay for G&H (out of pocket expenditure), which is then provided in a business context. This includes circumstances where re-imbursment is subsequently claimed; and
- G&H offered or accepted during business negotiations, such as contract awards, renewals, tenders, mergers and acquisitions.

Reporting Channels

If there is a concern about either employee, agent, or representative of PruBSN in connection with the giving and receiving of Gifts and Hospitality, such concerns can be raised using the following channels:

a) Speak Out hotline

- **Tel: 1-800-81-9801**

b) Web:

- www.prudentialspeakout.ethicspoint.com

Speak Out is the name for the confidential reporting channel at Prudential, which is available 24 hours a day, 7 days a week, and can accommodate calls in different languages. This channel is available to all employees, vendors, and business partners to raise their concerns. Speak Out offers you an external, independent channel through which you can raise your concerns in confidence and without fear of recrimination. Any report you make will be kept confidential to the fullest extent possible consistent with the law and good business practices.