



Group AML and Sanctions Policy

Objective and Principles

Prudential values its reputation for honesty, financial probity and reliability. It believes that any involvement in money laundering, terrorist financing or sanctions breaches will reflect adversely on its brand and reputation.

Its aim therefore is to limit its exposure to these risks by:

- Setting out clear policy and standards on Anti-Money Laundering and Sanctions Compliance;
- Training employees how to prevent and detect the use of money laundering, terrorist financing and sanctions non-compliance by its staff and third parties with whom it conducts business;
- Regularly conducting comprehensive risk assessments across business activities, including changes to products, processes and systems. These assessments document the inherent risks, controls in place and the effectiveness, and the residual risks;
- Conducting appropriate due diligence (“DD”) on a risk sensitive basis prior to entering a relationship with a customer, beneficial owner, supplier, vendor, employee, contractor or other third party, and periodically thereafter;
- Establishing and maintaining effective and appropriate processes, procedures, systems and controls for screening customers, beneficial owners, employees, contractors, agents, distributors, vendors and other third parties against applicable sanctions and PEP lists, and adverse media;
- Encouraging employees to be vigilant and report any suspicion of criminal activity or the use of proceeds of crime, providing them with confidential reporting channels and ensuring sensitive information is treated securely;
- Rigorously investigating instances of alleged money laundering or sanctions breaches, cooperating with regulators and law enforcement agencies in any externally-led investigations; and
- Taking firm and vigorous action against any individual(s) involved in money laundering or sanctions breaches