

# Group Escalation and Investigation Policy

## Objective

The purpose of this policy is to set the framework by which the Group can conduct investigations that are in line with its regulatory and legal obligations, while meeting the demands of a competitive commercial organisation. The principles set out in this policy are designed to enhance commercial opportunity while minimising corporate risk.

## Principles

All Business Units (BUs) and Local Business Units (LBUs) are required to have in place a process to:

- Escalate security breaches within the scope of this policy to Group Investigations;
- Co-ordinate with local operational risk teams where such events meet or exceed the reporting thresholds set out within the Group Operational Risk policy;
- Ensure that investigations are carried out by appropriately trained and experienced investigators and are proportionate, independent and objective, and only lawful, ethical, necessary, proportionate and appropriate access is gained to IT systems, records and sources of data;
- Engage external investigators that are authorised by BUs/LBUs Investigations Manager and approved by Group Investigations. Any external investigation activity conducted on Prudential's behalf must comply with Group Escalation and Investigation Standards;
- Ensure investigation observations are recorded and tracked to conclusion and available for Investigation Quality Assurance review; and
- Comply with all local regulatory and statutory requirements relating to escalation and investigation activities.