

PRUDENTIAL ANTI-HUMAN TRAFFICKING AND ANTI-SLAVERY POLICY

Prudential has a zero-tolerance policy prohibiting slavery or trafficking in persons and trafficking-related activities. Prudential does not permit its employees, subcontractors, vendors, suppliers, or other entities doing business with Prudential to engage in any form of slavery, human trafficking or any of the above activities. Prudential also prohibits retaliation against anyone who files a complaint or reports a suspected violation of this policy.

The prohibited activities include, but are not limited to, the following:

- Engaging in any form of trafficking in persons in the performance of any work; Procuring commercial sex acts in the performance of any work;
- Using forced labor, child labor or prison labor in the performance of any work;
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of candidates/employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
 - Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place; Charging candidates/employees recruitment fees;
 - Failing to provide return transportation or pay for the cost of return transportation upon the end of employment, for an employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of work, unless the employee is legally permitted to remain in the country of employment and chooses to do so, or if an appropriate agency has exempted this requirement;



- Providing or arranging housing that fails to meet the host country housing and safety standards; and
- If required by law or contracts, failing to provide an employment contract, recruitment agreement, or other required work document in writing and in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating. The employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

An employee or other party who violates this policy will be subject to appropriate discipline by Prudential, up to but not limited to, disclosure of the violation to government officials, termination of an employee's employment and/or termination of the services of any subcontractor, vendor, supplier or other entity.

Anyone who suspects a violation of this policy has occurred may escalate the matter to Prudential management, human resources or the local business ethics contact. Consistent with the local laws, the matter may also be brought to the attention of compliance and/or legal contacts, Corporate Investigations, Internal Audit or Global Business Ethics & Integrity.

Prudential's Anti-Human Trafficking and Anti-Slavery Policy applies to all companies, branches, subsidiaries, affiliates, joint venture and private equity investments, where Prudential has management control. Where Prudential does not have management control, Prudential will use good faith efforts to cause the adoption, implementation, and enforcement of suitable the Policy to the extent practicable. This Policy applies to all employees, officers, directors (collectively "Employees"), and third parties acting on behalf of Prudential anywhere in the world.

Published December 2023