

Prudential Supplier Code of Business Ethics

Prudential is committed to conducting business in an honest and ethical manner and with the highest standards of integrity and accountability in all countries in which we operate. We expect that our contractors, consultants, suppliers and vendors (collectively, “Suppliers”) conduct themselves with this same level of honesty and integrity in the provision of all goods, services and business activities undertaken for the company.

Consistent with Prudential’s values, we expect our Suppliers to demonstrate their commitment to ethical, humane, socially responsible and legally compliant business practices. This Supplier Code of Business Ethics (“Supplier Code”) sets forth these expectations for all Suppliers providing goods or services to Prudential. We expect our Suppliers to conduct their activities and operations in accordance with this Supplier Code and to maintain and enforce policies that support these values.

Prudential conducts screening during the supplier selection process and also expects its Suppliers to be able to demonstrate their compliance with this Supplier Code upon request. Suppliers who act inconsistently with this Supplier Code jeopardize their future relationship with Prudential.

The expectations in this Supplier Code are not intended to conflict with the terms of a Supplier’s contract with Prudential. In the event of a conflict between the terms of a Supplier’s contract and this Supplier Code, the contract terms will prevail.

Integrity and ethical business practices

Honesty, integrity and accountability are core values at Prudential. The company will, in all of its business activities in all jurisdictions around the globe, comply with the company’s [Code of Conduct](#) and all applicable laws and regulations. Prudential similarly expects all Suppliers to act in accordance with the highest standards of personal and professional integrity and ethics in their business dealings. Suppliers are expected to review Prudential’s Code of Business Conduct and Ethics and conduct themselves in accordance with the principles and values it sets forth.

Suppliers must comply with all applicable fair trade, antitrust, competition, anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act.

Gifts, Entertainment, Conflict of Interest

Suppliers may not give, offer, promise or accept any kickback, bribe, political contribution, gift, favor or anything of value when dealing with government officials or any other person for the purpose of improperly obtaining or retaining business, influencing action or obtaining any form of improper benefit for or on behalf of Prudential.

Reporting a Concern

If, in dealings with Prudential, Suppliers become aware of any situation they believe may violate Prudential’s Code of Conduct or this Supplier Code, they are encouraged to report their concern to Prudential’s Ethics and Compliance Office.

For questions about this Supplier Code or to report a concern, including anonymously where permitted by local law, please contact, the Prudential Ethics Helpline at 1.800.752.7024 (if in the United States) or submit a report to the [Ethics Helpline](#) website. Prudential fully investigates alleged misconduct, addresses misconduct, and is committed to preventing the recurrence of misconduct.

Anti-retaliation

Suppliers must prohibit retaliation against their employees who report compliance or other ethical issues learned during the course of work performed for Prudential or who cooperate in good faith with the investigation of such a complaint.

Human rights and Fair Labor Practices

Respect for and commitment to human rights is a fundamental part of Prudential’s culture. We have set forth our commitment to human rights in [Prudential’s Human Rights Statement](#).

Prudential is committed to working with Suppliers who share our fundamental values and demonstrate their own commitment to promoting individual human rights. We expect our Suppliers to treat their employees, agents, customers and business partners with respect and dignity, free from abuse, harassment or discrimination based on any status, condition or category protected by law. Suppliers must fully comply with all applicable labor, health and safety, anti-discrimination, anti-retaliation and other workplace laws, including those addressing equal pay, child labor, forced labor, slavery and human trafficking, and wage and hour laws.

Supplier diversity

Prudential is committed to providing opportunities for qualified businesses owned by people of diverse backgrounds to participate as suppliers to our company. More information can be found on our [Supplier Diversity](#) site. We encourage supplier diversity through the use of diverse suppliers to provide the goods and services we use in the communities we serve whenever possible. Our Supplier Diversity Program uses several classifications for diverse Suppliers, including business enterprises owned by minorities, women, veterans, service-disabled veterans, people with disabilities and LGBT. Our goal is to increase our total spend with diverse suppliers while maintaining competitive sourcing and selection standards. We expect our Suppliers to incorporate these principles of supplier diversity in their operations and when making their subcontractor decisions.

Cybersecurity and Data Privacy

Suppliers are responsible for protecting all Prudential Information throughout its lifecycle as defined by requirements in Prudential's Information and Cyber Security and Privacy policies, standards, and procedures. Suppliers are required to ensure any Prudential Information System that stores, processes, or transmits Prudential Information for which they are responsible is secured in accordance with Prudential's Information and Cyber Security policies, standards, and procedures. We expect Suppliers to develop programs designed to protect and preserve the confidentiality, integrity and continued availability of all information entrusted to them by Prudential. All Supplier personnel who access Prudential Information and Systems must adhere to all Prudential Information and Cyber Security policies, standards, and procedures. Additionally, Suppliers must maintain and enforce strong privacy policies and data security controls and comply with all applicable legal and regulatory requirements as well as contractual obligations with Prudential.

Risk Management

Suppliers are expected to have robust risk management processes in place appropriate to the services being provided, including but not limited to material categories of risk such as cyber security, privacy, business continuation, records management, physical security, vendor governance, and regulatory compliance.

Environment

Across all aspects of our business and through public policy initiatives, Prudential promotes responsible environmental practices that seek to reduce our carbon footprint and build resilient communities. These practices extend to the work we do with our customers in helping them mitigate risks

associated with changing climate conditions. More information may be found on our [Environmental and Sustainability](#) site. Prudential expects our Suppliers to comply with all applicable environmental laws and to work to minimize any negative environmental impact from their operations, including reducing or mitigating emissions, increasing sustainable use of natural resources and reducing or eliminating waste.