

Vendor Terms of Engagement

Anti-Money Laundering and Office of Foreign Assets Control

Prudential will not knowingly engage in financial transactions that involve proceeds from unlawful activity or that support terrorist activities (commonly referred to as “money laundering” or “terrorist financing” respectively, and described below in the Additional Information section).

Additionally, Prudential will not engage in financial transactions with individuals, entities and restricted countries designated by The U.S. Department of the Treasury Office of Foreign Assets Control (OFAC) or similar sanctions regulations in other countries where the Company does business. For more information on OFAC, see the Additional Information section below.

Prudential will file government reports, including those concerning suspicious activities, as required by applicable law.

In particular, the following activities are prohibited globally:

- Knowingly engaging or attempting to engage in any transaction involving proceeds derived from unlawful activity;
- Knowingly engaging or attempting to engage in any transaction that supports terrorist activity;
- Knowingly engaging or attempting to engage in any transaction in violation of OFAC restrictions or similar regulations in non-U.S. countries;
- Accepting cash from a customer to purchase a cashier’s check (or similar instrument) for that customer;
- Advising customers on how to avoid anti-money laundering reporting requirements;
- Arranging with a financial institution for a customer to exchange cash for a different form of payment;
- Transporting physically any cash or monetary instruments into, or out of, the United States or another country for customers; and
- Disclosing to customers that they are the subjects of a regulatory report or under investigation, except to the extent that this prohibition is contrary to local country law.

The prohibitions set forth above apply to you in connection with your engagement with Prudential. And if you suspect that a Prudential employee, customer, potential customer or financial transaction may involve suspicious activity, money laundering or terrorist financing, you must notify your Prudential contact, who then must advise the Anti-Money Laundering Unit, Law or Compliance immediately.

ADDITIONAL INFORMATION

Descriptions of Money Laundering and Terrorist Financing

In general, money laundering or terrorist financing may involve one or more of the following activities:

- Knowingly dealing with proceeds from criminal activity;
- Knowingly dealing in funds to support or facilitate criminal or terrorist activities;
- Being involved in any activity designed to hide the nature, location, source, ownership or control of proceeds of criminal activity; and/or
- Advising a Prudential employee or customer on how to structure a transaction to avoid reporting and record keeping requirements.

Additional Prohibited Conduct

In addition, prohibited conduct would include the knowing failure to act, such as failing to report money-laundering activities to Prudential, not following appropriate detection procedures, or knowingly ignoring indications of criminal conduct.

What is OFAC?

The U.S. Department of the Treasury Office of Foreign Assets Control (OFAC) administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals against targeted countries, terrorists, international narcotics traffickers, and those engaged in activities related to the proliferation of weapons of mass destruction. OFAC acts under U.S. Presidential wartime and national emergency powers, as well as authority granted by specific legislation, to impose controls on transactions and freeze non-U.S. assets under U.S. jurisdiction. Many of the sanctions are based on United Nations and other international mandates, are multilateral in scope, and involve close cooperation with allied governments. OFAC regulations require financial institutions to take certain actions to prevent prohibited transactions and to address potentially prohibited transactions when identified.