



Better together

Our Code of Conduct

The standards we expect at M&G
January 2025

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The background of the page is an abstract composition of various shades of blue and teal. It features soft, ethereal light rays or beams that originate from the upper left and fan out towards the right, creating a sense of depth and movement. The overall effect is clean, modern, and professional.

Introductory messages

A message from our Group CEO



Andrea Rossi
Group Chief Executive Officer

Dear colleagues

Welcome to **Better together**, our Code of Conduct guide to the standards of behaviour we expect from each other at M&G and which our clients expect us to live and breathe in everything we do for them.

This document is not a set of rules but a general guide to help us be our best in every interaction we have. We are all ambassadors of our business and have an individual and a collective responsibility to create a positive experience at M&G.

It starts with our purpose, to give everyone **real** confidence to put their money to work, but we will only deliver on that purpose if it is mirrored in the individual behaviours we are all committed to – tell it like it is; own it now; and move it forward together – and reflected in what it feels like to work here.

Those standards underpin our strong reputation, giving our clients confidence that we are the right place to put their money to work. They are what allow us to build lasting relationships, based on trust, with our clients, shareholders and regulators, and deliver on our ambitions for growth.

Of course we have to conduct ourselves professionally and do everything that is required of us in law, regulation, policy and procedures, but that's not enough – we need to live our values of care and integrity, consistently doing what is right, even when that is the harder choice.

This guide is vitally important to me and my colleagues on the M&G plc Board. It is the first and most important document for us all to read and defines the common commitment we need to build a legacy we can all be proud of.

We can only do this together.

Thank you.

Andrea

Delivering on our purpose

Our purpose is to give everyone **real** confidence to put their money to work.

To help us deliver on our purpose, it is underpinned by strategic drivers that give us focus and a set of leadership behaviours that we expect everyone at M&G to operate to. Together with our values (care and integrity), these elements help define our culture, what we want it to feel like to work here and the environment that we want our clients to experience in every dealing with us.

A culture aligned with our purpose is crucial to delivery of our strategic ambitions. It underpins our reputation and the trust we have built with our clients, shareholders and regulators, and drives confidence that we will be here for them for the long term. It is also what nurtures a sense of belonging, fostering teamwork, trust in our colleagues and the confidence to be our best every day.

Developing and nurturing our culture means operating as one team, aligned around a common shared purpose. It is everyone's responsibility and something we can only do together.



TELL IT LIKE IT IS

IS

Respectfully speaking up to create better ways forward – both direct and empathetic

IS NOT

Challenging without first understanding

OWN IT NOW

IS

Putting your name on things with confidence to drive progress and results quickly

IS NOT

Failing to take the right people on the journey with you and escalating decisions unnecessarily

MOVE IT FORWARD TOGETHER

IS

Forming cross-functional teams to seize the right opportunities and solve real problems

IS NOT

Creating cumbersome committees and meetings that slow us down but don't add value

Going beyond the rules

We will always comply with the law. As a listed group, regulated by the PRA and FCA, we also have other strict regulations and obligations that we must follow. We reflect those in many of our policies and procedures at M&G.

Demonstrating that we meet all the legal and regulatory standards expected of us is vital to maintaining our operational integrity and preserving our reputation. Compliance with the M&G policies and procedures that underpin those standards is a non-negotiable for working here. It is a core responsibility for each of us to understand and follow all of the policies, procedures and local rules that are relevant to our role.

Compliance is not enough

The workplace standards we set cannot document every eventuality, nor would we want to try to do that; it would be a recipe for an unworkable bureaucracy. The other problem is that, just because something is not illegal, that doesn't mean that it is the right thing to do. We have to trust each other, and be trusted, always to do what is right.

We have to apply our own individual judgement to ensure that, individually and collectively, we always do the right thing, even if that represents the hardest option available to us. We also need the individual courage to speak up if something doesn't feel right, particularly if we don't see the right outcomes being delivered for our clients.

This Code helps us better understand some of the wider expectations for working at M&G, the support that is available to us and the ways in which we can raise concerns about things we see or hear that don't feel right.



Who our Code applies to

This Code is essential reading for everyone at M&G and anyone involved in the delivery of our products and services. It represents the standards set by the Board of M&G plc.

It applies to everyone working at M&G – employees, contractors, temporary staff and consultants.

Our colleagues and our clients expect and require the same standards from everyone at M&G, whether or not they are permanent members of the team.

Our individual responsibility

We have an individual responsibility for reading, being familiar with and acting in accordance with this Code, and for speaking up if we see or hear of anything that is not in line with the Code. M&G will not tolerate conduct that is not aligned with the standards described in this Code.

Our Board

Our Board set the tone for how things are done at M&G and are committed to leading by example.

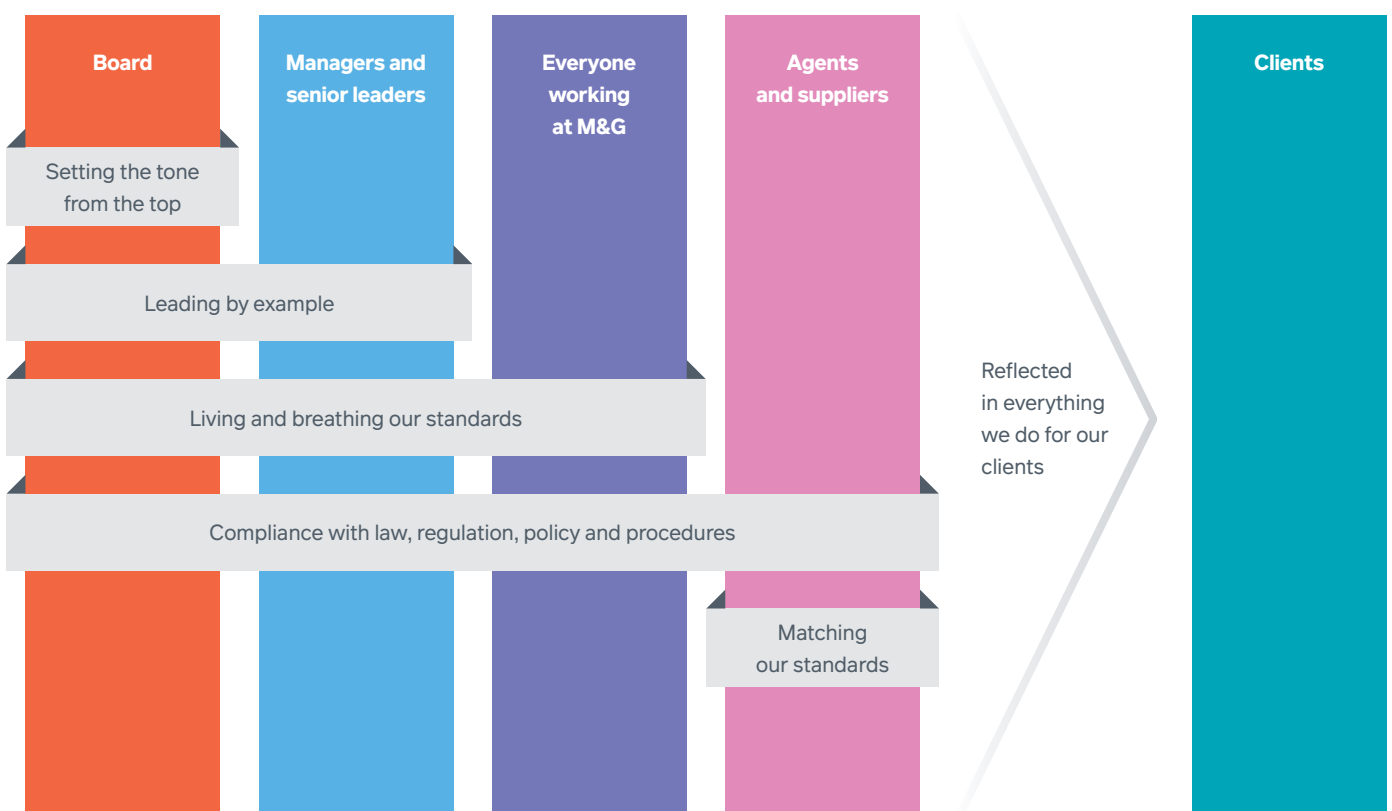
Our managers

We expect our managers at M&G to be role models for our standards and to create the right environment in their teams to encourage openness.

Our managers are there to help. This can include actively asking for ideas and inputs in meetings with their teams, ensuring that they are available and approachable, making time and actively listening when a colleague raises an issue and following up.

Our agents and suppliers

We will only work with agents and suppliers that are committed to matching our standards.



The standards we set at M&G

The culture we strive for at M&G is one where we can be our best, where we are trusted and where our clients know we are there for them.

Being our best

Feeling respected, safe and supported

Being trusted

Acting responsibly, owning our decisions and feeling confident to speak up

Being there for our clients

Putting our clients at the heart of everything we do

...and always living our values

Acting
with
care

Acting
with
integrity

Everything we do has to be underpinned by our values

Our reputation

We each have a vital role to play in maintaining M&G's reputation. Corporate reputations like ours are hard to establish and easy to lose. We will be judged by the standards of our poorest behaviour.

Stakeholder expectations

Our stakeholders expect high standards from us in everything we do. For example:

- our share price is driven by market confidence in our ability to deliver consistently strong results
- our regulator requires us to ensure good outcomes for our retail customers
- section 172 of the Companies Act requires senior decision making to take into account a range of stakeholder considerations
- we are committed to M&G being a great place to work

If we let down any of our stakeholders, we risk losing the trust and confidence of all the others.



Being our best

Being our best

Feeling respected, safe and supported

We are at our best when we feel respected, safe and supported, confident of being our true selves and knowing we have the support of our colleagues. Together we are committed to a culture where we all belong.

We want to feel:

- safe and secure at work
- confident being our authentic, whole selves and valued for that
- free from bullying, harassment or discrimination
- trusting that behaviour towards others that is intimidating, threatening, degrading or hostile will not be tolerated
- we offer protection for employees from victimisation
- we have equal opportunities to be our best
- we are looking out for each other



We enable a safe environment to share our concerns

Our personal responsibility:

Physical safety

- Understand and follow the evacuation procedures
- Report any hazards we see
- Keep our workplace secure
- Wear our lanyards and escort our visitors

Psychological safety

- Think about the impact on others of everything we say or do; understand that perceptions of what is acceptable vary
- Be polite and respectful
- Be honest and direct, but deliver difficult messages with empathy and understanding
- Value our differences

Well-being

- Support colleagues working flexibly
- Don't expect people to respond out of hours
- Take our breaks and holiday entitlement



Escalate any concerns through the relevant channel without delay

M&G has a duty to keep us safe at work, and we all have a duty to guard against hazards in the workplace, but being our best goes well beyond physical safety.

Psychological safety is key

We need to know we will be valued for who we are, included in the teams we are part of and that our contributions will be welcomed and listened to. To bring the best out of each other, we need to treat everyone with dignity and respect, exploring, understanding and celebrating the things that make us different.

Everyone is different

Celebrating those differences and elevating our strengths is a vital part of teamwork. Whilst we want our teams to be safe spaces where colleagues feel free to be their true selves and even make occasional, well-meaning mistakes, we will not tolerate disrespect, discrimination, harassment or bullying of any kind. This includes behaviour that is threatening, intimidating, abusive, degrading or hostile.

Bullying and harassment

Bullying and harassment is totally unacceptable and can have no place at M&G. However, not everyone easily recognises the effect of their own behaviours, nor do we all react the same way to the behaviour of others. It is the impact on others of what we say and do that matters, not our intent. We must also accept that different people can react in different ways to the things we say and do.

Behaviour which can amount to bullying includes making derogatory remarks, excluding or ignoring a team member, or setting someone up to fail. It does not include giving reasonable, constructive criticism of someone's performance at work.

Harassment can include unwanted physical contact or sexual advances, sharing offensive social media content, mocking a person's disability or telling a racist 'joke'.

We have to be conscious of, and sensitive to, the impact we have on others. Sometimes a remark or comment can be hurtful even if it was well-meant. If a colleague tells us to stop making remarks, continuing to do so can amount to harassment.

Alcohol and illegal substances

It is important to remember that these standards apply to us in all work-related environments, including off-sites, conferences and social events, regardless of the number of participants. We recognise that alcohol may be available at some social and other events.

We take the over-consumption of alcohol very seriously and expect colleagues at all times to maintain the same high standards expected of them in the workplace. We have zero tolerance for the use of illegal substances.

Well-being

Support for our colleagues also means looking out for their well-being.

We know working at M&G can be demanding from time to time, but we don't want anyone here working excessive hours for an extended period of time. Some roles may be required to work mandatory overtime, particularly when 'on call', but for others it may be that it is challenging to meet the demands of our roles within regular working hours. If we feel that we are consistently working in excess of our contractual hours, we should feel confident having open conversations with our managers and leaders about that. Finding a healthy work/life balance is important as a driver of productivity and performance, and to achieving our goals as a team.

We have a responsibility to look after ourselves as well as our colleagues. Guidance is available on the intranet in various places including the Well-Being Hub and the People Hub, and support is also available from our trained Mental Health First Aiders. Colleagues also have access to the Employee Assistance Programme.



Being trusted

Being trusted

Acting responsibly, owning our decisions and feeling confident to share our concerns

No team can be successful unless its members trust each other. Trust requires us to act responsibly, openly and to consistently high ethical standards.

We want to feel:

- we act in an open and transparent way
- we have systems that our customers can rely on to keep their data safe
- we have confidence in our internal processes and understand why they are there
- our suppliers are held to the same standards
- we are individually empowered to do what is right
- we are trusted members of our community



We are listened to when we share our concerns

Our personal responsibility:

Use social media responsibly

- Don't defame or disparage others
- Never criticise our clients, competitors or regulators
- Never use M&G logos in our personal posts

Help ensure a working environment free from crime

- Keep laptops or other valuables secure and keep confidential papers locked away when not in use
- Keep all personal and company data secure
- Actively guarding against cybersecurity; never share our passwords, download unapproved software or open suspicious links
- Be vigilant in identifying fraud, money laundering and financial crime

Respect our systems

- Never access systems that we don't need for our role
- Never access or share inappropriate content
- Limit our personal use of M&G equipment to what is appropriate

Guard our reputation

- Never accept or offer bribes
- Avoid conflicts of interest and declare any that arise
- Never say anything in an email or chat that we would not be happy seeing in print
- Only use approved suppliers and be vigilant to the risks of modern slavery
- Do not exchange (including offering, disclosing or receiving) commercially sensitive information, directly or indirectly, with our competitors.



Escalate any concerns through the relevant channel without delay

M&G hires colleagues with the judgement and experience to do their job. We are given the authority we need to perform our roles well. Although we must respect the limits that are placed on our individual authorities, we should challenge what we see as unnecessary bureaucracy where we come across it. We should leverage cross-functional teams as a way of moving forward together.

At M&G, we trust each other to behave responsibly. This includes taking care of M&G equipment. We must follow the rules around systems access and use that are designed to protect the integrity of our systems. It also extends to our personal use of social media, where we must not do anything which could harm M&G's reputation.

We are also trusted when we share ideas and suggestions for improvement, knowing that our contribution will be welcomed and heard, and to raise our concerns constructively when things don't feel right.

Our community

We want M&G always to be seen as a trusted member of the communities in which we operate.

M&G in the community

Our ambition is to build safer and stronger communities and we work with charity partners to create opportunities for a better future.

Through community investment, we help to break down the barriers that prevent people from living the lives they want. We provide a framework for community engagement and offer support at a strategic and local level.

With a focus on urban regeneration, economic empowerment and community building, we help build inclusive and resilient communities, working with our charity partners to develop strong, sustainable projects that meet local needs.

We aim to provide the essential needs for communities to thrive, to equip people with the tools they need to be financially secure and to provide opportunities for people to prepare for the future.

Volunteering is a great opportunity to get together as a team and give back to our local communities. All M&G employees are entitled to two paid days of volunteering each year. Skills-based volunteering has included targeted mentoring. Other volunteering events have included tree planting, beach cleaning and the refurbishment of housing for vulnerable groups.

A tall, cylindrical lighthouse with alternating red and white horizontal bands stands on a dark, rocky coastline. The lighthouse has a red lantern room at the top. The surrounding water is a deep teal color, and the foreground shows the rugged, dark rocks of the shore. A teal rectangular box is positioned in the upper right quadrant of the image, containing white text.

Being there for our clients

Being there for our clients

Putting our clients at the heart of everything we do

Our clients are the reason we are here. Our purpose depends on always being there for them and putting them at the heart of everything we do. That means doing what is right for our clients and building environmental and other long-term considerations into our decision-making.

We want to feel:

- we will always be there for our clients
- our clients are always able to speak out
- services are designed with, and appropriate for, their needs
- trusted to look out for our clients' best interests
- we're listening and learning when things go wrong
- we're there for the long term



We speak up for our clients when things aren't right

Delivering consistently good outcomes for our clients

Evidencing consistently good outcomes for our clients is important for M&G in building trust and confidence in our products and services.

We have an express duty to our retail clients through the FSA's Consumer Duty obligation, which requires us to offer products and services which are fit for purpose and reflect fair value, ensuring that our communications are understandable.

Our personal responsibility:

- Treat clients with respect, care and integrity
- Never taking advantage of vulnerability
- Keeping communications simple and being transparent with our clients around risks
- Avoiding conflicts of interest, where competing obligations or motivations may damage the interests of our clients
- When things go wrong or a client raises a complaint, understanding what went wrong, taking corrective action and providing a lasting solution
- Supporting our commitment to an environmentally stable and low-carbon economy by incorporating environmental considerations into our decision



Escalate any concerns through the right channel without delay

Consumer Duty

The FCA's new Consumer Duty rules set higher expectations of the standard of care that financial services firms provide to retail customers. The Customer Duty outcomes are that retail clients need to receive suitable products and services, transparent pricing and fair value, the information required to make informed decisions and good quality customer support.

At M&G, we are committed to delivering consistently good outcomes for all our customers. To support the delivery, we have ensured that our outcomes align with those that the FCA expects to see. We have also enhanced our monitoring and analysis of client outcomes, including reviews of investment performance, customer journeys and product value for money. We also survey our clients about their expectations and experience and continue to learn and improve from complaints. This allows us to identify and fix any pain points for our clients.

Acting sustainably

The decisions we take have an impact beyond our clients. We want to use community investment to help break down the barriers that prevent people from living the lives they want.

We are strongly committed to the transition to an environmentally sustainable and low-carbon economy. We manage our own impacts and promote sustainable practices. We also believe that sustainability factors should be integrated into our investment decision-making process at appropriate levels across the business to identify related risks and opportunities.



Sustainability at M&G

At M&G, we use our broad capabilities to drive positive real-world change and support the move to a more sustainable world. As an asset owner and asset manager, we are well-positioned to support positive change.

We seek to create long-term value for our clients by addressing the interconnected risks and opportunities. Financing climate solutions is a key aspect of our approach and our investment decisions are shaped by a framework that aligns our assessment of opportunities with our commitments. As an active investor, engagement forms a critical part of our efforts to decarbonise our investment portfolio. We are committed to better embedding sustainability across our business portfolio. We are also focused on developing our knowledge of the impacts, dependencies, risks and opportunities around natural capital in an investment context.

As a business, M&G is committed to reaching net-zero emissions by 2050.

Avoiding conflicts of interest

Putting clients at the heart of everything we do means taking decisions that are always in the best interests of our clients. That can be challenging where we experience competing obligations or motivations (either as a firm or as individuals).

Demonstrating that we always put our clients' needs first and that we deliver consistently good and fair outcomes for them requires us to have robust and effective processes for identifying the potential conflicts of interest and taking action to eliminate or mitigate the situation.

For M&G as a firm, potential conflicts can arise:

Between M&G and a client

An example would be M&G having the opportunity to make a profit at the expense of a client. Our services need to fit the needs, characteristics and objectives of our clients, represent fair value and help them pursue their financial objectives.

Between our clients

Examples would be M&G helping a client make a profit at the expense of another or favoured clients receiving preferential treatment. We need to ensure consistently good outcomes for all our clients.

Between members of the M&G group

We have product manufacturing and distribution activity within M&G. An example would be one part of the group and its clients benefitting at the expense of another part and its clients. We need to have an overall M&G perspective on everything that we do and make sure that the actions we take ensure consistently good outcomes for all our clients.

We have processes and controls in place to manage conflicts like these and to communicate openly to our clients about the steps taken to address a potential conflict when a situation arises.

We also have responsibilities as individuals to make sure that we avoid our own interests and motivations interfering in our duties to our clients and M&G. These can arise through:

Reward

An example would be seeking to make a personal gain at the expense of a client. We must always make decisions that are in the client's best interest.

Bribes

We do not engage in, or tolerate, any form of bribery or corruption. If we are offered a bribe or a bribe is requested from us, we must report it.

Gifts and hospitality

We must always make decisions objectively and must never be improperly influenced by the offers of gifts or hospitality above modest limits. It is important that we declare any gifts or hospitality in accordance with our procedures and that we decline any offer where it may be seen as influencing our decision-making.

Client vulnerability

We must never take advantage of a client in a situation of vulnerability and design our products and services with vulnerable people in mind. We need to understand the individual needs, characteristics and objectives of our clients, ensure that they have an appropriate level of understanding of our products, including the benefits and risks) and try to ensure consistently good outcomes for everyone. If we identify a vulnerable client, we should use the internal specialists trained in vulnerability.

External considerations

We all have activities, relationships and interests outside work. We must make sure that they do not conflict, and could not be seen as conflicting, with our duties to our clients and our responsibilities to M&G. An example would be having a close friend in an organisation that is supplying services to M&G. We must avoid situations where we might have competing or conflicting obligations or motivations and always act in the best interests of our clients, in line with our duties to M&G. We need to report our external interests (including the interests of family and close friends) and escalate any situational conflict that arises so that steps can be taken to address the situation.

Personal relationships at work

Personal relationships (particularly romantic relationships or close friendships at work) can lead to both actual and perceived conflicts. As a consequence, all personal relationships must be declared to allow M&G to take appropriate steps to address the conflict.

Follow our processes

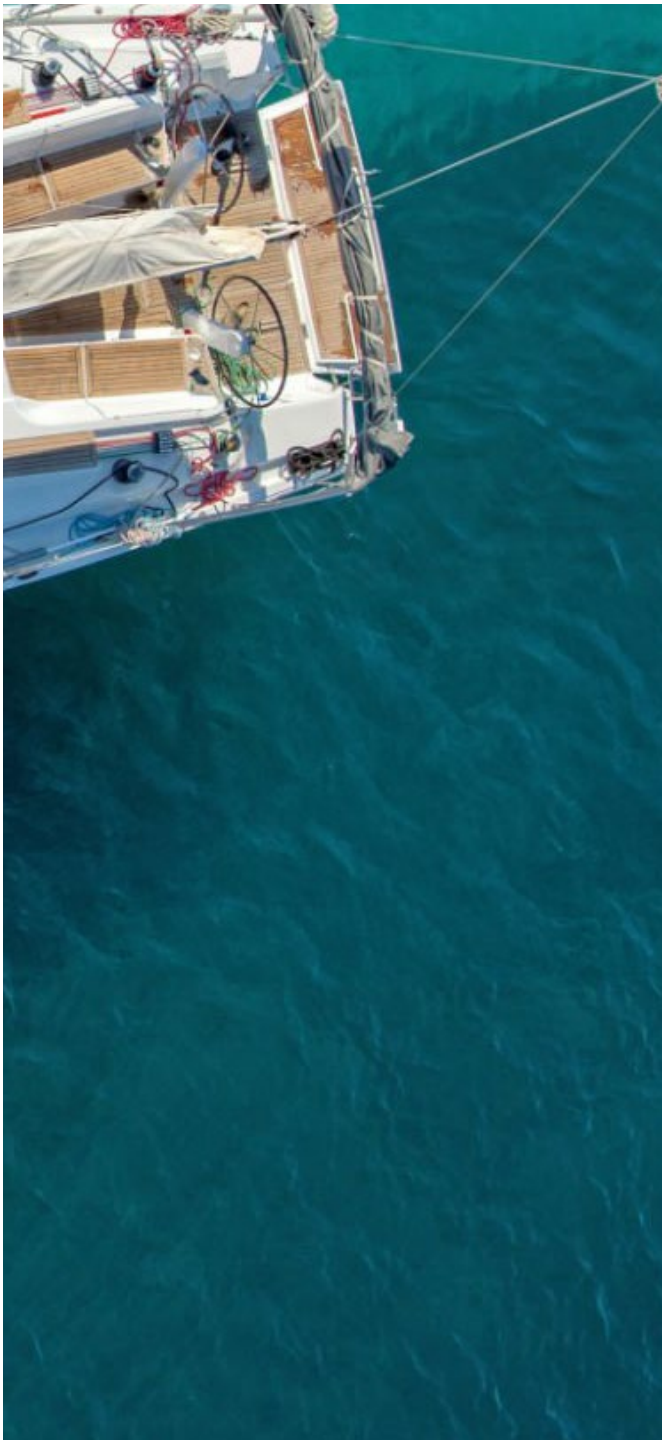
Many of our processes have been designed to eliminate bias and ensure consistently objective and fair outcomes. These include our processes for recruitment, performance management, talent management and supplier selection. It is essential that we follow relevant M&G process to ensure that the decisions we take cannot be criticised.



Living our culture
through our values

Living our culture through our values

We always act with care and integrity, treating our clients with the same level of respect that we would hope to receive ourselves and making choices for the long term.



Acting with care

- We treat clients and colleagues with the same level of respect we would expect for ourselves
- We invest with care, making choices for the long term



Acting with integrity

- We empower each other to do the right thing
- We honour our commitments to others
- We act with conviction



Speaking up when things don't feel right

- We are confident that we will be listened to and knowing that appropriate action will be taken



Making good decisions

Making good decisions

At M&G, colleagues are trusted to make good decisions, using our personal judgement to make day-to-day decisions that are in line with our values and help us deliver on our purpose.

We empower colleagues to do their jobs well and to take decisions that are commensurate with their skills, experience and seniority. That empowerment must be accompanied by colleagues taking responsibility for their decision-making.

Our individual authority limits

We have to have limits on our individual authority. Even our Group CEO has authority limits above which decisions have to go to the M&G plc Board.

We all have to follow policies and procedures that have been designed by subject matter experts to ensure consistently safe outcomes and consistently high standards of risk management and internal control.

We also have individual delegated authority limits that cascade down from the powers delegated by the M&G plc Board to the Group CEO. Our delegations of authority are intended to help colleagues make better, properly informed decisions with appropriate support where needed. The delegated authority limits that we are given reflect our seniority, experience and the scope of our roles. When we come across a decision that is above our individual authority limits, we need to take our recommendation to someone more senior who has the necessary authority.

We should have the confidence to act responsibly, take routine decisions ourselves and accept the personal accountability that comes with that. Cutting through unnecessary internal discussions is a key part of empowering our colleagues. But that does not mean that we expect all our decisions to be taken in isolation. Sometimes we don't have all the insights we need to be sure that we are making the best possible decision. It is really important that we seek out the right input from colleagues, including specialist functions, where needed.

Management committees

We also have a number of management committees to which key decisions can be escalated. This allows the decision to be discussed and debated with the help of a range of senior views around the table. It is important to appreciate that those meetings have no collective authority. In a management committee meeting, decision-making cannot exceed the individual authority limits of the most senior person in the room, who is ultimately responsible for the final decision reached.

Difficult decisions

From time to time we all encounter decisions where it is hard to reconcile the needs of all stakeholders and where there isn't always an objectively 'right' answer. To find the best way forward in those more complex decisions, we want colleagues to take advantage of the range of expertise at M&G and the diversity of thought that we have here. When it isn't obvious what the right thing to do is, we want colleagues to make values-based decisions.

M&G has a simple decision-making framework that is intended to help colleagues navigate difficult decisions, where the needs of all stakeholders can't easily be met, and make better, values-based decisions.

Making difficult decisions

Many real-world decisions are clouded by uncertainty and ambiguity

There isn't always an obviously **'right'** answer that meets the needs of all our stakeholders

OWN IT NOW



What is the impact on customers and other stakeholders?

Some questions we might not otherwise ask:

Is this in line with
our values?

Would I be happy
explaining this
to a regulator or
the press?

How would I feel
if it happened
to me?

What if everyone
did it?

Is it legal?

Compliance is not enough – just because something is legal doesn't make it right



If the answer is 'yes',
proceed with care

Sharing and discussing difficult decisions really helps – always talk to the right functional experts



**MOVE IT FORWARD
TOGETHER**

A close-up photograph of a wooden pulley system on a ship. The pulley is made of dark wood and has a rope with white and green stripes running through it. The rope is coiled around the pulley. The background is a blurred view of the sea and sky.

Escalating our concerns

Escalating our concerns

‘Telling it like it is’ is vital in identifying opportunities for improvement and allowing M&G to address and correct things that are going wrong before they escalate.

We should not assume that colleagues who are closer to the issue will have separately escalated their concerns.

Many issues can be resolved quickly through discussions in our teams and with line managers, but it is essential that serious concerns are escalated without delay through the appropriate channels. This allows the right team to address and resolve the issue and to drive sustainable improvement from the learnings.

We want everyone at M&G to be confident asking questions, making suggestions and raising concerns, knowing they will be listened to and what they say will be considered and, if appropriate, acted on.

We know that raising concerns sometimes requires courage. The fear of potential retaliation can be a barrier to doing so. We have zero tolerance for retaliation at M&G.

Speak Out

You should report a concern through Speak Out if you are aware of or suspect:

- anything that would be the subject matter of a qualifying or protected disclosure
- a breach of the company’s policies and procedures and
- behaviour that harms, or is likely to harm the reputation or financial well-being of M&G plc

Concerns that should also be reported include (but are not restricted to) suspicion or actual incidents of:

- an offence or a breach of the law, rules and regulations applicable to M&G plc
- a breach of M&G plc’s policies and procedures
- a breach of M&G plc’s values and behaviours
- bullying or any form of harassment
- racial, sexual, or disability discrimination concerns
- health and safety of the public and/or other employees
- possible human rights violations
- suspicions of financial crime
- concerns about corporate accounting practices, internal accounting controls, or auditing matters, including breaches of tax law
- breaches of the protection of privacy and personal data, and security of network and information systems
- behaviour that harms or is likely to harm the reputation or financial well-being of M&G plc
- neglect, abuse or not acting in the best interest of M&G plc’s customers; or other unethical conduct

If we have any concerns or suspicions that any of the matters above have occurred, are ongoing or may occur, we should raise a report to 'Speak Out'. Speak Out, which is overseen by the Whistleblower's Champion, who is one of the independent non-executive Directors, includes a confidential reporting service that is an online (EthicsPoint) and freephone service, which is hosted independently by a third party. To raise concerns with Speak Out we can also contact mandgspeakout@mandg.com. All reports are handled by a specialised, dedicated team.

We should speak out about any suspected serious breach of policy, regulation, illegal act and/or claims of retaliation. We are supported in being able to report our concerns anonymously, if we choose (and if permissible under local law).

Any information shared will be treated with the strictest of confidence.

We also protect those who use Speak Out by:

- conducting a risk assessment at the start of the confidential process
- following up with the individual following completion of the confidential investigation
- confidentially monitoring the individual's subsequent treatment.

Retaliation

We do not tolerate retaliation in response to anyone speaking out or otherwise raising concerns. This includes anyone who reports a concern externally to any regulatory, investigatory or other agency or authority.

If we believe we have been subject to retaliation for reporting a concern, or we see this happen to a colleague, we should immediately contact the Speak Out team, who will investigate our concerns. Reports and concerns will be treated with the strictest of confidence. Team members who engage in retaliation towards other colleagues may be subject to disciplinary action up to and including termination of employment or contract for services.

The following are some examples of retaliation which could lead to disciplinary proceedings against anyone performing them, and which should be reported to the Speak Out team immediately if experienced or we see this happening to a colleague:

- suspension, lay-off, dismissal or equivalent measures
- demotion or withholding of promotion
- transfer of duties (to a less desirable position), change of location of place of work, reduction in wages, change in working hours (denying overtime), denying benefits
- withholding of training
- a negative performance assessment or employment reference
- coercion, intimidation, harassment or ostracism
- discrimination, disadvantageous or unfair treatment
- failure to hire, failure to renew, or early termination of, a temporary employment contract
- refusal of transfer or promotion
- being refused an employment reference
- failure to convert a temporary employment contract into a permanent one
- harm, including to the person's reputation, particularly in social media
- blacklisting on the basis of a sector or industry-wide informal or formal agreement
- making threats of retaliation.



Additional information

Sustainability

More information about our focus on sustainability factors, how they underpin our ability to execute our strategy and deliver on our purpose, can be found [\[here\]](#).

M&G in the Community

More information about we are delivering on our mission to build inclusive and resilient communities, and how to offer voluntary support, can be found [\[here\]](#).

Additional sources of support

Colleague Forum

We actively encourage colleagues to interact with the Colleague Forum for support and information, consultation for business change and collective representation (where relevant).

Trade unions

We recognise our colleagues' right to freedom of association and to talk to Unite or other relevant trade unions.

Employee Assist Programme

Details of the Employee Assist Programme available to all colleagues can be found [\[here\]](#).

Useful links



M&G plc



Conflicts of Interest



Diversity, Inclusion and Well-being



Health and Safety



Speak Out



Media, Social and Political Policies



People Policies



Policy Governance Framework.

