



Policy Statement of Allianz Technology SE on the implementation of human rights and environmental due diligence

as required by the German Supply Chain Due Diligence Act

Foreword

Allianz Technology SE is part of Allianz Group. Allianz Technology SE consists of two business segments (Technology & Services) and acts as the global shared IT service provider for the Allianz Group, but also enables a wide range of solutions such as financial business services, actuarial services, professional services, HR services and insurance operations. Allianz is one of the world's leading insurers and asset managers, with 122 million private and corporate customers in more than 70 countries. In 2022, Allianz employed almost 160,000 people around the world. Allianz SE, the parent company of Allianz Group, is headquartered in Munich, Germany, while Allianz Group has entities in over 50 countries around the world.

At Allianz Technology SE, we are committed to human rights

At Allianz Technology SE, we recognize the importance of human rights as both a value-based topic and a business issue.

Allianz Technology SE is committed to

- supporting and respecting the protection of international human rights
- ensuring that Allianz Technology SE is not complicit in human rights abuses.

Allianz Technology SE aims to identify, prevent, mitigate, or remediate adverse human rights impacts linked to our business activities and operations, including our supply chain. Our approach has been guided by the OECD Guidelines for Multinational Enterprises and the U.N. Guiding Principles on Business and Human Rights.

The human rights¹ that Allianz Technology SE is committed to respecting are those agreed by governments in

- the International Bill of Human Rights; this consists of the Universal Declaration of Human Rights; the International Covenant on Economic, Social and Cultural Rights; and the International Covenant on Civil and Political Rights and its two Optional Protocols
- the core International Labor Organization (ILO) Conventions; these include the prohibition of child labor and forced labor; freedom of association and the right to collective bargaining; occupational health and safety; and the elimination of discrimination in respect of employment and occupation.

Allianz has been a member of the U.N. Global Compact (UNGC) since 2002 and uses the UNGC principles as orientation for its business activities. For more details and Allianz' annual Communication on Progress, see the [UNGC website](#).

At Allianz Technology SE, we strive to continuously improve our human rights due diligence processes, including through monitoring by our Human Rights Officer, established in 2023.

This policy statement lays out

- the due diligence processes that Allianz Technology SE has established for human rights and certain environmental risks in its own operations and supply chains²
- the results of our first annual risk analyses in own operations and supply chain
- the expectations that Allianz Technology SE has towards employees and suppliers with regard to human rights and certain environmental conventions,

as required by the German Supply Chain Due Diligence Act (GSCA).³

The Board of Management of Allianz Technology SE

December 2023

1. Our Allianz Technology SE due diligence processes according to the German Supply Chain Act

Worldwide scope

The German Supply Chain Act (GSCA) applies to large Germany-based companies⁴ and their “own business area”. The own business area of Allianz Technology SE encompasses all entities of Allianz Technology Group that are part of the Allianz Technology System of Governance, irrespective of location. Therefore, our GSCA risk management covers all those Allianz Technology entities and their suppliers worldwide.

Elements of our risk management

Our GSCA risk management is designed to identify, prevent, mitigate, and eliminate human rights and certain environment-related risks⁵ and violations.

At Allianz Technology SE, the GSCA risk management framework that we have established in 2023 consists of the following due diligence processes:

- clear assignment of roles and responsibilities for the implementation of due diligence obligations within risk management and for the monitoring of risk management
- regular and ad-hoc risk analyses in own operations and supply chains⁶, the results of which are communicated to all relevant decision-makers
- appropriate preventive / remedial measures for risks / violations identified in own operations and supply chains
- a worldwide complaints mechanism
- a policy statement on our human rights strategy that is updated at least annually
- monitoring of the risk management through the function of a human rights officer
- ongoing documentation of all due diligence efforts
- an annual report to the Federal Office for Economic Affairs and Export Control (Bundesamt für Wirtschaft und Ausfuhrkontrolle, BAFA) that is also published on our company website, tech.allianz.com.⁷

We have created a methodology to analyze, weigh and prioritize risks that combines elements of Allianz’ existing risk management frameworks with the requirements of GSCA and BAFA.⁸ This methodology is used in both own operations and supply chains.⁹

Roles and responsibilities

Dedicated human rights experts in our Sustainability function co-ordinate the implementation of human rights due diligence worldwide, whilst working closely with all relevant functions (including Procurement, People & Culture, Legal, Risk and Compliance) and our entities worldwide.

To implement the risk management in our entities, we have identified local “GSCA risk experts” and “GSCA risk managers”, in people and culture, procurement, real estate management, sustainability and other relevant functions. They are responsible for, among other things, identifying, analyzing, and prioritizing risks; identifying violations; and defining and implementing local preventive measures and remedial actions.

To fulfil these responsibilities, GSCA risk experts have been trained during 2023 in all human rights and environmental risk categories listed in GSCA Sec. 2 (see annex).

The Board of Management of Allianz Technology SE has appointed a Human Rights Officer¹⁰ in 2023 to monitor the effectiveness of the risk management system worldwide. The Human Rights Officer regularly reports to the Management Board of Allianz Technology SE.

1.1 Risk management in our own operations

Risks most relevant for our sector

Allianz Technology SE provides the Allianz Group with shared services such as IT services, financial business services, actuarial services, professional services, HR services and insurance operations services. We do not produce any goods in the traditional sense.

Generally, human rights risk associated with the own operations of this kind of business activity is rather low, compared, with producing industries. This conclusion is supported by our research using publicly available data on sectoral human rights risks.¹¹

Similarly, the risks that the own operations of financial service providers cause severe environmental damage is assessed as modest. This applies in particular to the environmental prohibitions named in GSCA, such as the production, handling and disposal of highly toxic chemicals.

Taking the nature of our business into consideration, we have analyzed all risks listed in GSCA (see annex) and identified the following risk categories as potentially the most relevant for our own operations:

- discrimination and unequal treatment
- occupational health and safety
- living wages
- freedom of association and the right to collective bargaining.

At Allianz Technology SE, we already have in place preventive measures for all these risk categories, in line with our global principles as well as local requirements and regulations.

Extensive measures reflect our values

The obligation to respect human rights is part of the Allianz Group Code of Conduct. The Code of Conduct is designed to ensure responsible and ethical behavior within Allianz Group. All employees are expected to become familiar with the Code of Conduct and to apply these principles in their daily work (more in section 2).

Further measures have been implemented to minimize risks to relevant human rights and labor standards in our own operations:

- The protection of human rights, such as the prohibition of discrimination and harassment, occupational health and safety, the right to form and join trade unions, and fair wages, have been enshrined in our internal corporate rules, depending on local laws and requirements.
- Our annual “Allianz Engagement Survey” gives employees the opportunity to anonymously provide feedback on issues such as workload, wages and diversity.
- With the “multi-rater” tool, employees can give anonymous multi-dimensional feedback to executives and people leaders every year.
- Our global performance management focuses equally on “what” (outcome-oriented objectives) and “how” (how we treat each other as well as our customers and other stakeholders).
- To ensure our employees’ occupational safety, they are regularly trained on relevant safety measures (safety training and practical safety instructions).
- To ensure that our employees are protected from unpredictable events, such as natural disasters or fires, we have a variety of alarm systems and evacuation plans in place, depending on local conditions and requirements.
- To support our employee’s physical health, we provide them with ergonomic workplaces and equipment.
- We offer our employees resources to help them manage work-related stress and increase their well-being, including our “Employee assistance programs” or our “Global mindfulness movement”.

In case we learn of any suspected or actual violations of human rights in our own operations, for example through our complaints mechanism, we will take immediate action to prevent such violation or minimize its impact.

We assess the effectiveness of preventive and remedial measures on a regular basis, at least once a year.

- ⇒ Read the [Allianz Technology Code of Conduct](#)
- ⇒ Get more details on our People & Culture strategy in our [Allianz People Fact Book](#)
- ⇒ Learn more about [Diversity, Equity and Inclusion](#) at Allianz

Most risks were assessed as “low” in 2023

The entities of Allianz Technology SE’s own business area in over 20 countries worldwide identified and analyzed over 380 individual risks in their local operations.

Most of the identified human rights risks were assessed as “low”. Only a few were assessed as “medium”.

Among the risks that our entities identified in 2023, they assessed risks in the categories “unequal treatment” and “occupational health and safety” as the most relevant for their local operations, in particular:

- disadvantages regarding career advancement opportunities
- lack of training for employees with regard to safety precautions

Allianz Technology SE already has extensive preventive measures in place to address risks, especially regarding equal treatment and the safety, health, and well-being of our employees.

No violations of human rights or the environmental conventions listed in GSCA were identified in our entities as part of the 2023 risk analysis. Therefore, no particular remedial actions were needed.

Since the risk situation in Allianz Technology SE’s own operations did not significantly change or expand in the course of 2023, no ad-hoc analyses were needed or carried out.

1.2 Risk management in our global supply chain

Most of our direct suppliers work in low-risk sectors

To gain first insights into overall human rights risks in our supplier base, Global Sourcing & Procurement allocated global 2022 procurement spending to commodities and sector codes. We used publicly available as well as third party provider data to identify those commodities that are associated with potentially higher human rights risks.

We concluded that around three-quarters of our total procurement spending in 2022 was on low-risk sectors, such as IT, legal and other services. The remainder went to medium-risk sectors, such as IT infrastructure or facilities management. There was no procurement spending in 2022 on sectors that are, according to publicly available indices, associated with high human rights risks.

Existing measures to address human rights and environmental risks in our supply chain

At Allianz Technology SE we want to ensure respect for human rights and environmental protection not only in our own operations but also along our supply chain. We encourage our suppliers to take responsibility for human rights in their own operations and supply chains, notably through implementing due diligence procedures in line with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

To minimize human rights and environmental risks in our supply chain, we have established the following measures:

- The Allianz Sustainable Procurement Charter sums up our sustainable procurement aspirations for Allianz, including our human rights approach. It provides guidance for both internal buyers and external suppliers. It strongly encourages all our suppliers to manage their own supply chains in line with the environmental, social and governance principles laid out in the Charter, to minimize risks further down in the Allianz supply chain (indirect suppliers).
- The Allianz Vendor Code of Conduct must be accepted by all companies¹² that wish to participate in an Allianz tender and / or enter a contractual relationship with Allianz. Our Vendor Code of Conduct spells out our expectations towards our suppliers regarding human rights and employment standards as well as environmental due diligence (see details in section 2).
- During the Allianz supplier onboarding, suppliers with whom we have larger order volumes must answer additional sustainability-related questions, including on their human rights due diligence processes. Suppliers that do not establish appropriate human rights due diligence in their operations and supply chains are subjected to an ad-hoc risk analysis.
- Suppliers that have been identified as potentially high risk can be asked to sign additional human rights-related contractual clauses.
- As additional evidence of our sustainability work with suppliers, our first Net-Zero Transition Plan from September 2023 includes our commitment that all our suppliers should have public net zero commitments in place by 2025.

If we find that human rights violations have occurred or are imminent at one of our suppliers, we take immediate remedial actions, in line with our ability to influence the respective supplier. We may enforce additional human-rights related contractual clauses or use other measures, depending on the type of violation. As a last resort, we will sever the business relationship with a supplier that persistently violates human rights.

We assess the effectiveness of such preventive and remedial measures on a regular basis.

- ⇒ Read the [Allianz Group Vendor Code of Conduct](#)
- ⇒ Read the [Allianz Group Sustainable Procurement Charter](#)
- ⇒ Read the [Allianz Net-Zero Transition Plan 2023](#)

Identified risks were mostly low

For the annual risk analysis performed in 2023, we compiled information on all direct suppliers of all entities that are part of the “own business area” of Allianz Technology SE (see section on “Worldwide scope” above).

In line with a risk-based approach, we used abstract risk filters to focus on potentially higher risk suppliers. For this, we:

- identified the sector and country of every supplier based on invoicing data
- compiled publicly available indices at country level, to identify the most relevant risk areas for individual countries
- took into consideration a sector risk indicator based on publicly available data
- applied country and sector specific risk filters to enable a selection of potentially high-risk suppliers out of the total population of direct suppliers.

We then sent our proprietary “GSCA risk questionnaire” to all potentially high-risk suppliers for a concrete risk analysis. After analyzing the responses received we prioritized the following risks as the most relevant in our supply chain:

- Causing environmental changes (Impairing humans through soil, water and air pollution)
- Freedom of association (No employee representation)
- Withholding of an adequate wage (Not considering local living expenses)

The analyses of the GSCA risk questionnaires we received showed that the risks in the assessed companies were generally “low”. Only a very small number of risks were assessed as “medium” or “high”.

For the limited number of suppliers for which risks were assessed as “high”, the local procurement function, in cooperation with the affected suppliers, have started implementing preventive measures. In most cases, suppliers have already implemented preventive measures which led to a low rating of probability of occurrence.

No violations of human rights or GSCA-listed environmental conventions were identified as part of the 2023 risk analysis of our global supplier base. Therefore, no specific remedial actions were required.

No ad-hoc risk analyses were conducted on direct or indirect suppliers of Allianz Technology SE in 2023.

2. What we at Allianz Technology SE expect from our employees and suppliers

In line with our Allianz commitment to human rights, we expect our employees and our suppliers to also respect human rights.

What Allianz Technology SE expects from its own employees

The Allianz Technology Code of Conduct reflects our values and principles at Allianz Technology and gives our employees guidance in their actions and decisions. The Code of Conduct is applicable to all employees in Allianz Technology SE’s own business area.

At Allianz Technology SE, we expect employees to support and adhere to human rights in alignment with international standards. We encourage our employees to be vigilant about any potential risks to human rights related to our operations or business activities.

In particular, we expect our employees to

- treat everyone fairly and with respect
- help create a fair environment where people can succeed regardless of gender, age, ethnicity, disability, religion, sexual orientation, or cultural background
- not make decisions related to employment – such as hiring, promoting, assigning work tasks, or dismissal – based on the characteristics mentioned above
- never accept bullying or harassment
- make sure they follow safety and security guidelines and avoid situations that could cause harm
- help create an empathetic work environment and consistently address our mental, emotional, physical, and social health to maintain and improve wellbeing.

⇒ Read the [Allianz Technology Code of Conduct](#)

What Allianz Technology SE expects from its suppliers

We at Allianz Technology SE expect all our suppliers to act with integrity and respect the rights of their own employees and other people who may be affected by the supplier's business activities.

In particular, we at Allianz Technology SE expect our suppliers to

- ensure equal treatment, equal employment opportunities and equal pay for work of equal value
- not discriminate against employees on the basis of gender, age, ethnicity, disability, religion, sexual orientation, or cultural background
- prevent any form of threats, coercion or harassment, including sexual harassment or corporal punishment
- respect legislation against child labor, and not enable any form of forced labor or human trafficking of involuntary labor through threat, force, fraudulent claims, or other coercion
- comply with all applicable labor laws, including those on compensation and working hours; and make a reasonable effort to make sure their suppliers do the same
- respect workers' rights to freedom of association and collective bargaining in accordance with applicable local laws and regulations
- ensure that their business activities do not cause environmental changes that have a harmful impact on humans
- ensure that the use of persistent organic pollutants or the import and export of hazardous wastes comply with all applicable conventions
- establish processes to enable them to identify key risks to human rights and labor standards.

At the same time, we expect our vendors to comply with all applicable environmental laws and regulations¹³, and, where appropriate, establish sustainability policies and environmental management practices that encourage environmental stewardship by their supply chain.

⇒ Read the [Allianz Group Vendor Code of Conduct](#)

⇒ Read the [Allianz Group Sustainable Procurement Charter](#)

3. Our complaints mechanism – SpeakUp@Allianz

Allianz Group has strengthened its existing worldwide complaints mechanism to make it fully compliant with Sec. 8 GSCA and BAFA guidelines¹⁴. Under the headline SpeakUp@Allianz, our complaints mechanism has the following features:

- It is accessible to Allianz Technology SE employees, to the employees of Allianz Technology SE's direct and indirect suppliers and anyone else who might be impacted by the economic activities of Allianz.
- It enables people to draw attention to human rights and environmental risks as well as violations of human rights or environmental obligations that have arisen as a result of the economic activities of Allianz or of direct or indirect suppliers.
- The Allianz compliance experts responsible for handling the reports submitted through SpeakUp@Allianz are independent and observe confidentiality rules.
- Allianz does not tolerate any reprisals or any disadvantages for reporting persons related to their complaint.
- The Allianz complaints mechanism consists of several channels, including email, postal letter and an online reporting tool that allows the creation of anonymous mailboxes through which the reporting person can communicate with the responsible compliance experts. The tool is available in all countries in which Allianz operates. The tool is available in German, English and 19 additional languages.
- The rules of procedure for the Allianz Technology SE complaints mechanism have been published in text form. They contain clear and comprehensible information on the process of reporting, the communication between the compliance experts and the reporting person as well as the investigation of incidents raised by the reporting person.

In 2023, Allianz Technology Compliance did not substantiate any breaches related to the human rights or environmental conventions listed in Sec. 2 GSCA on the basis of reports submitted through SpeakUp@Allianz.

- ⇒ Learn more about the [Allianz Technology Complaints Channels](#)
- ⇒ Read the [Rules of Procedure](#) for the Allianz Technology SE complaints mechanism
- ⇒ Access our anonymous [SpeakUp@Allianz tool](#)

Annex

Human rights risks and environmental risks listed in GSCA

Allianz Technology SE's due diligence obligations described in this document relate to the protected rights and environmental prohibitions listed in Sec. 2 (2) GSCA.

We have paraphrased these rights and environmental prohibitions here in simpler language.

These rights and environmental prohibitions have been agreed by governments in international agreements. They are not directly binding for companies. Most (albeit not all) governments have transposed these rights and environmental prohibitions into local law or regulations, so that they become binding for companies in their jurisdiction.

A "risk" under GSCA is defined as the likelihood that a company harms people by disregarding one of these local laws or regulations.

This includes the risk that companies

- require or accept that children work, even though they are too young for the work they do
- require or accept that children engage in activities that are harmful to their health and wellbeing and / or illegal; or that children are prostituted
- force people to work, for example by confiscating their passports or withholding their wages; or enslave people
- endanger people by not complying with local rules on occupational health and safety; or tolerate or ignore frequent accidents or health hazards in the workplace
- do not properly train employees for their work, especially if that work is dangerous for the employees or others
- endanger their employees' physical or mental health by requiring them to work very long hours without sufficient breaks
- prevent or prohibit that employees join trade unions; or ban trade unions, strikes or collective bargaining in their organization – even though these rights are protected by national law
- unfairly discriminate against employees on the basis of, for example, gender, age, ethnicity, disability, religion, sexual orientation, or cultural background
- do not pay their full-time employees enough money to live on
- deploy untrained or unsupervised security forces who threaten people's lives and limbs
- do something (or omit doing something) that leads clearly to a human rights violation of employees or other people
- evict people from their land without proper legal procedures and compensation
- harm people, or destroy livelihoods, by heavily polluting the soil, air or water through their activities
- manufacture products that contain mercury or dispose of mercury in an unsafe way
- produce, use in large quantities or store incorrectly certain toxic chemical called persistent organic pollutants (POPs)
- export toxic waste to countries that cannot properly dispose of it.

¹ Allianz is equally committed to protecting human rights and the environment. For details of our environmental and climate change policies, see our Sustainability Report on Allianz.com [Sustainability Report 2023](#). The German Supply Chain Due Diligence Act requires that Allianz extends its GSCA due diligence to certain environmental risks as listed in Sec. 2 GSCA. Where appropriate, these risks are included in our due diligence processes as described in this document. A full list of GSCA protected positions is in the annex of this document.

² For our due diligence approach in underwriting and proprietary investments, please see our Sustainability Integration Framework on Allianz.com [Allianz Sustainability Integration Framework](#)

³ Deutsches Lieferkettensorgfaltspflichtengesetz - LkSG

⁴ The German Supply Chain Act applies in 2023 to Germany-based companies with more than 3,000 employees, and that threshold is lowered to 1,000 employees in 2024. Therefore, in 2023 Allianz SE (as the holding company of Allianz Group) and four Allianz-owned Operating Entities based in Germany are directly subject to GSCA. In 2024, a total of nine Allianz companies based in Germany are directly subject to GSCA. The Allianz companies that are directly subject to GSCA report separately from Allianz SE on the fulfilment of their GSCA due diligence obligations.

⁵ GSCA covers environmental risks related to mercury, persistent organic pollutants, and export of toxic waste as well as pollution (of soil, water, air) so severe that it affects human health or livelihoods.

⁶ For the annual risk analysis in supply chains, we utilize a risk-based approach, which means we use various abstract risk filters (sector, country, level of influence) to focus our due diligence on potentially high-risk suppliers. The annual risk analysis in our own operations covers all entities in our System of Governance.

⁷ The first Allianz Technology SE annual report to BAFA for the year 2023 is published in 2024.

⁸ Bundesamt für Wirtschaft und Ausfuhrkontrolle (BAFA): „Risiken ermitteln, gewichten und analysieren; Handreichung zur Umsetzung einer Risikoanalyse nach den Vorgaben des Lieferkettensorgfaltspflichtengesetzes“; (BAFA Guideline: Identifying, weighting and prioritizing risks), August 2022.

⁹ GSCA risk experts analyze the likelihood and severity of a risk separately using structured questions and generating a risk score for each. The combined score places the result into a “heat map” that classifies the risk as low, medium or high. A high risk is one that is highly likely to occur (or recur) and / or has potentially severe or irreversible impacts on people.

¹⁰ The Allianz Group has appointed a Group Human Rights Officer who works closely with the Human Rights Officers of the respective Operating Entities of Allianz Group.

¹¹ For example: NAP-Branchenstudie "Die Achtung von Menschenrechten entlang globaler Wertschöpfungsketten - Risiken und Chancen für Branchen der deutschen Wirtschaft" (NAP Sectoral Study, Respect for human rights along global value chains, risks and opportunities for German business); Bundesministerium für Arbeit und Soziales, June 2020.

¹² Alternatively, Allianz suppliers can submit their own Code of Conduct if the latter includes equivalent human rights and environmental protections.

¹³ The Allianz Group Vendor Code of Conduct refers in particular also to the Minamata Convention on mercury, the Stockholm Convention on persistent organic pollutants and the Basel Convention on the export and import of hazardous waste, which are referenced in GSCA.

¹⁴ Bundesamt für Wirtschaft und Ausfuhrkontrolle: „Beschwerdeverfahren organisieren, umsetzen und Evaluieren; Handreichung Beschwerdeverfahren nach dem Lieferkettensorgfaltspflichtengesetz“; (BAFA Guidelines Organizing, implementing and evaluating complaints mechanisms; Complaints mechanism according to the Supply Chain Due Diligence Act), October 2022.

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Allianz Technology SE

ESG & Sustainability

Königinstr 28

80802 München

[Sustainability \(tech.allianz.com\)](https://tech.allianz.com)