

SpeakUp@Allianz

RULES OF PROCEDURES

for the complaints procedure in accordance with the German Supply Chain Due Diligence Act in the Allianz Group as well as for other compliance-relevant reports

for Allianz Technology SE

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1. Introduction to the Allianz complaints procedure

At Allianz, we act with integrity and are committed to complying with laws, regulations and internal rules that govern our operations and our business relationships. Our purpose – “We secure your future” – commits us to long-term thinking and sustainable actions.

These Rules of Procedure explains in detail and in a language that is easy to understand what you can do if you have information that we at Allianz Technology or Allianz Group do not live up to these commitments.

If you have information that an entity of the Allianz Group has violated laws, regulations or internal rules, we encourage you to report this to us.

You can also use the Allianz complaints procedure if you want to report risks or violations related to human rights or environmental topics occurring at any Allianz entity or one of its supplier.

With the SpeakUp@Allianz online tool, we offer a simple way to report concerns. The tool fully protects your identity.

Each reported incident is dealt with by our independent examiners in an impartial and effective way.

Your report can help us to stop potential violations, support the people affected and improve our preventive measures. It also helps us to minimize the risks of future wrongdoings.

Thank you for helping us to live up to our commitments by speaking up!

2. What kind of incidents can you report?

The incidents that can be reported encompass, but are not limited to, the following:

- fraud, theft or corruption
- antitrust violations and potential conflict of interest
- financial irregularities or breaches of accounting or tax provisions

You can also report to us if you have information that in entities of the Allianz Group or any of its suppliers, the following violations occur or might be imminent:

- discrimination, harassment, harmful working conditions, and other breaches of human rights
- severe environmental damage.

You can find a more detailed list of the risks and violations that are referred to in the German Supply Chain Act in [Appendix 2](#) of this document.

If you would like to know which standards apply to us and our suppliers, please refer to:

- The Allianz Technology Code of Conduct¹ [LINK](#)
- The Allianz Supplier Code of Conduct² [LINK](#)

3. Who can report an incident?

Our SpeakUp@Allianz tool and the other channels of the complaints procedure are open to anyone who works for the Allianz Group as well as for anyone inside or outside Allianz who has information about a potential or actual wrongdoing related to Allianz entities or their suppliers.

You can report an incident also if you are not directly affected by it. If you have been affected by an incident, you can also ask someone else to submit a report on your behalf.

4. How you can report?

You can report either anonymously or you can provide your identity.

Regardless of how you submit your report (email, via the SpeakUp@Allianz tool, letter, or in-person), your report will be handled with the utmost diligence and confidentiality.

Anyone can report incidents at any time via the following channels:

- SpeakUp@Allianz tool [LINK](#)³ (see [Appendix 1](#) for details and how to use the tool)
- via email to complianceInvestigationsAZTandAZS@allianz.com, compliance@allianz.com, or anti-fraud@allianz.com
- via letter to the following address:

Allianz Technology SE & Allianz Services Compliance department
Dieselstrasse 8
85774 Munich
Germany

¹ [https://tech.allianz.com/content/dam/onemarketing/azt/allianz-technology/media-res/document/compliance-/updated/allianztechnologycodeofconduct\(EN\).pdf](https://tech.allianz.com/content/dam/onemarketing/azt/allianz-technology/media-res/document/compliance-/updated/allianztechnologycodeofconduct(EN).pdf)

² https://www.allianz.com/content/dam/onemarketing/azcom/Allianz_com/about-us/strategy-values/compliance/Allianz_Vendor-Code-of-Conduct.pdf

³ <https://www.bkms-system.com/bkwebanon/report/clientInfo?cin=by94UJ&c=-1&language=eng>

You can also report in person to the respective local Allianz compliance team in the country where you live. Please check the local Allianz website for contact details. You can find information about Allianz contacts worldwide [here](#)⁴.

5. How do we deal with your report?

We are committed to maintaining an impartial and effective process for dealing with reported incidents. We examine all reported incidents with the same diligence and in compliance with the applicable legal requirements.

All reports are examined by appointed and trained staff in the responsible compliance team under guarantee of impartiality, objectivity and confidentiality. All data is processed in accordance with the applicable local data privacy provisions.

Each case is different, so we cannot say in advance exactly how long the process will take. In each and every case, we are committed to taking care of your complaint promptly and to mitigate risks as soon as possible.

Below you will find a summary of the steps that we take to deal with reported incidents, regardless of the channel you use.

Please note: if you want to stay anonymous, we can stay in touch with you through a personal secure mail box if you use the SpeakUp@Allianz tool. See [Appendix 1](#) below on how this works.

5.1 Receipt of a report

We will confirm the receipt of your incident report within seven days after the report has reached us via the reporting channel that you chose.

5.2 Assessment of the reported incident

Independent examiners in the responsible compliance team will review the report and will get back to you in case additional information is required.

5.3 Examination

Trained staff in the responsible compliance team will examine the reported incident comprehensively. If the examiner thinks it is necessary, they will contact you to discuss the incident.

⁴ <https://www.allianz.com/de/ueber-uns/wer-wir-sind/weltweit.html>

Depending on the matter in question, other experts from the Allianz Group (e.g. from human resources, procurement, sustainability or data privacy) might need to be involved for the examination– while always adhering to the principle of confidentiality, protection of the reporting person’s identity and data protection requirements.

5.4 Corrective measures

Allianz Group is committed to taking adequate and effective measures to address any confirmed incident. If the violation or risk occurs in the own business area of Allianz, the risk will be minimized and the violation will be stopped. If the reported violation or risk occurs at a supplier, Allianz will seek to achieve the same results wherever possible.

The responsible compliance team will, whenever possible and necessary, exchange with you and/or the concerned persons on the corrective measures and envisaged solutions.

Each measure will depend on the nature and severity of the violation or identified risk. In case the reported violation or risk happened at a supplier company of Allianz, the measure will depend on Allianz’ ability to influence the situation.

5.5 Communication with the reporting person during the examination

To the extent possible, Allianz will communicate with you, either directly or via a personal secure mailbox. (please refer to [Appendix 1](#))

At the latest three months after we have received your report, we will provide you with feedback. If the examination of the case takes longer than three months, we stay in contact with you to the extent possible.

5.6 Conclusion of the procedure

The examination of an incident can be concluded for several reasons, such as:

The reported violation or risk

- was not confirmed
- had already been resolved
- the measures taken addressed the incident.

We will provide you with a notification once the examination has been concluded, provided we have a communication channel with you.

6. How is a reporting person protected?

The Allianz Group does not tolerate retaliation against anyone who reports an incident in good faith (that means that the reporting person had reasonable belief that the information about the reported incident was true).

This applies also for cases where an examination does not confirm the allegations.

If you experience retaliation as a result of your report, please do not hesitate to contact us either through the [SpeakUp@Allianz](#) tool or via the other channels as outlined above.

7. Who is responsible for the complaints procedure?

The Allianz complaints procedure is steered centrally by the Group Compliance department of Allianz SE. Group Compliance may forward reports to other Allianz compliance departments of affected Allianz entities, depending on the nature of the incident.

Thank you for helping us to live up to our commitments by speaking up!

The effectiveness of these Rules of Procedure is assessed annually.

- End of the Rules of Procedures-

Appendix 1: The SpeakUp@Allianz tool and how to use it

The SpeakUp@Allianz online tool allows you to report an incident to Allianz. You can either provide your name or send the report anonymously.

The tool is available in all countries in which we operate. In 2023, the tool is available in German, English and 19 additional languages. We will add more languages in the future.

You can reach the tool here: [LINK](#)

<https://www.bkms-system.com/bkwebanon/report/clientInfo?cin=by94UJ&c=-1&language=eng>

All the reporting and examination procedures described in this document apply to the online tool as well as the other reporting channels mentioned in this document.

On the webpage of the tool, you will find further instructions on how to use it.

If you prefer not to disclose your identity in your report, you can set up a personal secure mailbox to communicate with the responsible Allianz examiner.

To set up and access the personal secure mailbox, you can choose any username, together with a personal code. The Allianz examiners will have access to the information provided by you and will not be able to identify you personally unless you reveal your identity to them.

There are four steps in the reporting process:

1. First, you will be asked to read some information on the protection of your anonymity and to respond to a security question.
2. On the next page, you will be asked into which category your report falls, e.g. "human rights violation". This helps us to deal with your report promptly. If the incident you want to report does not fall into any of the categories listed in the SpeakUp@Allianz tool, or you do not know which category to choose, please select the category "any other violation of law or violation of regulations".
3. On the report page, you can describe your concern in your own words and answer questions about the incident via drop down menus. You can type up to 5,000 characters into the free text field, which corresponds to a full A4 page. You may also submit a file of up to 10 MB to support your report. Please bear in mind that documents can contain information about the author. After sending your report, you will receive a reference number as confirmation that you have submitted your report.
4. If you wish, you can set up a personal secure mailbox. You will receive feedback from us via this mailbox, including answers to questions and information about the progress of your report. If you have set up a secure mailbox, you can access it directly via the "Login" button.

As long as you do not enter any data from which conclusions about your person can be drawn, the technology of the Incident reporting will protect your anonymity.

Appendix 2: The human rights and environmental risks listed in the German Supply Chain Due Diligence Act

Below you can find a list of the protected human rights and environmental prohibitions listed in German Supply Chain Due Diligence Act (GSCA). We have paraphrased them 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 employees from joining 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 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.

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Allianz Technology SE & Allianz Services Compliance department

Dieselstrasse 8

85774 Munich

Germany