

# Allianz Partners

## Whistleblowing **RULES OF PROCEDURE**

in compliance with  
the German Supply Chain Due Diligence Act (GSCA)

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## 1. Why does Allianz Partners offer the Whistleblowing tool? What can you use it for?

At Allianz Partners, 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 Partners do not live up to these commitments.

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

You can report any kind of misconduct (see point 2 below for a list).

With the Whistleblowing tool, we offer a simple way to report concerns. The tool also fully protects your identity. We make sure that each reported incident is dealt with by our independent examiners in an impartial and effective way.

Based on your report, we can contribute to stopping any potential violations, help the people affected and improve our prevention 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?

You can use the Whistleblowing tool, or any of the other reporting channels listed below, if you have information that entities of the Allianz Partners or any of its suppliers violate any laws, regulations or internal rules.

The incidents you can report include e.g.:

- fraud, theft or corruption
- antitrust violations and potential conflict of interest
- financial irregularities or breaches of accounting or tax provisions
- discrimination, harassment, harmful working conditions and other breaches of human rights
- severe environmental damage

If you would like to know which standards are applicable to us and our suppliers, we refer to:

- The Allianz Code of Conduct<sup>1</sup> [LINK](#)
- The Allianz Supplier Code of Conduct<sup>2</sup> [LINK](#)

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<sup>1</sup> [https://www.allianz.com/content/dam/onemarketing/azcom/Allianz\\_com/about-us/strategy-values/compliance/code-of-conduct/code-of-conduct-accessible.pdf](https://www.allianz.com/content/dam/onemarketing/azcom/Allianz_com/about-us/strategy-values/compliance/code-of-conduct/code-of-conduct-accessible.pdf)

<sup>2</sup> [https://www.allianz.com/content/dam/onemarketing/azcom/Allianz\\_com/about-us/strategy-values/compliance/Allianz\\_Vendor-Code-of-Conduct.pdf](https://www.allianz.com/content/dam/onemarketing/azcom/Allianz_com/about-us/strategy-values/compliance/Allianz_Vendor-Code-of-Conduct.pdf)

### 3. Who can report an incident?

Our Whistleblowing tool and the other reporting channels are open to anyone who works for the Allianz Partners or its suppliers. It is also open for anyone else, inside or outside Allianz Partners, who has information about a potential or actual wrongdoing related to Allianz Partners 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.

For the purpose of this document, we refer to anyone who reports an incident as “reporting person”.

### 4. How can you report an incident?

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

Regardless of how you submit your concern (email, via the Whistleblowing 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:

- Whistleblowing tool [LINK](#)<sup>3</sup> (see below for details and how to use the tool)
- via email to [speak-up@allianz.com](mailto:speak-up@allianz.com)

via letter to the following addresses:

<p>Allianz SE Group Compliance</p> <p>Koeniginstrasse 28 80802 Munich Germany</p>	<p>Allianz Partners SAS AzP Compliance Eurosquare 2 7, rue Dora Maar 93400 Saint-Quen France</p>	<p>Allianz Partners AzP Compliance</p> <p>Werk3 Atelierstrasse 14 81671 Munich Germany</p>
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You can also report any incident in-person directly to the respective Allianz Partners Compliance Team in the country where you live. Please check the local Allianz Partners website for contact details. You can find information about Allianz Partners Contacts worldwide [here](#)<sup>4</sup>.

### 5. How do we deal with an incident?

We are committed to maintaining an impartial and effective process for dealing with reported incidents.<sup>5</sup> 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 and objectivity. All data is processed in accordance with the applicable local data privacy provisions.

<sup>3</sup> <https://allianz-whistleblowing-solution.speakup.report/whistleblowing-channel>

<sup>4</sup> [https://www.allianz-partners.com/en\\_global/contact.html](https://www.allianz-partners.com/en_global/contact.html)

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 mitigating any risks effectively.

Below you will find, in summarized form, 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 Whistleblowing tool (see Appendix 1 below on how this works). If you contact us through email or letter without providing contact details, we might not be able to contact you.

## 5.1 Receipt of an incident report

We will confirm the receipt of your incident report within seven days after the report has reached us.

## 5.2 Assessment of the 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.

Depending on the matter in question, other Allianz Partners experts (e.g. from Human Resources, Procurement, Sustainability or Data Privacy) might need to be involved – while always adhering to the principle of confidentiality, protection of the reporting person's identity and data protection requirements.

## 5.4 Corrective measures

Allianz Partners is committed to taking adequate and effective measures to address any confirmed incident.

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 Partners, the measure will depend on Allianz Partners' ability to influence the situation.

## 5.5 Communication with the reporting person during the investigation

To the extent possible, Allianz Partners will communicate with you, either directly or via a personal secure mailbox if you report via the Whistleblowing tool (Appendix 1)

At the latest three months after we 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:

- because the examination concluded that the raised concerns were not confirmed,
- the incidence had already been resolved,
- the measures taken addressed the incident.

We will provide you with a notification once the procedure has been concluded.

## **6. How is a reporting person protected?**

The Allianz Partners does not tolerate retaliation in any form 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.

In the context of a reported incident, retaliation could take the form of any action (or omission) that could lead to an unjustified disadvantage for the reporting person, such as:

- HR measures (e.g., written warning, transfer to another unit/department/entity, termination, withholding of promotions)
- Harassment or mobbing (e.g., creation of a hostile work environment, offensive and harmful behavior, intimidation of any kind, unwelcomed physical contact, exclusion from team activities)
- Compensation aspects (e.g., salary or bonus cuts)

If you experience retaliation as a result of your report, please do not hesitate to contact us either through the Whistleblowing tool or via the other channels as outlined above.

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

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## Appendix 1: The Whistleblowing tool and how to use it

The Whistleblowing tool is a complaints mechanism that allows you to report an incident to Allianz Partners.

You can either provide your name or send the report anonymously.

The tool is available in all countries in which we operate.

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

<https://allianz-whistleblowing-solution.speakup.report/whistleblowing-channel>

All the reporting and examination / follow-up procedures described in this document apply to the 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 examiner.

To set up and access the personal secure mailbox, you can choose any username together with a personal code. The 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 4 steps concerning 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 query.
2. On the next page, you will be asked into which category your report falls, e.g. are you reporting fraud, theft, mis-selling, discrimination, etc.? If the incident you want to report does not fall into any of these categories, 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 secured 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 secured 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 Act

Below is a list of human rights risks and environment-related risks explicitly mentioned in the German Supply Chain Due Diligence Act (GSCA). Allianz Partners is by law obliged to minimize these risks and act promptly and adequately in case of any violations in its own operations and its supply chain.

### HUMAN RIGHTS RISKS

#### Protection of workers - sec. 2 (2) no. 1 – 8

- Prohibition of child labor below the minimum permissible age, in accordance with the applicable law of the state of employment.
- Prohibition of the worst forms of child labor, such as underage prostitution, slavery, harmful work or illegal work like drug trafficking.
- Prohibition of the employment of persons in forced labor & Prohibition of all forms of slavery, meaning the
- Prohibition of the disregard of labor protection, meaning disregard for local occupational health & safety rules so that it results in human harm, for example because workstations are not safe, employees are exposed to chemicals or other harmful substances, employees are not properly trained, or workload and lack of rest results in excessive physical or mental fatigue
- Prohibition of disregard for freedom of association, which means that employees should (in accordance with local laws) be free to join trade unions that enjoy the right to strike, collective bargaining and standing up for their members' interests at work
- Prohibition of unequal treatment in employment, for example in the grounds of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religious belief
- Prohibition of withholding an adequate living wage, which means at least the local minimum wage as laid down by local law or what is determined by the place of employment

#### Protection of livelihoods - sec. 2 (2) no. 9 – 10

- Prohibition of contamination of air, water or soil, and prohibition of causing excessive consumption of water
- Prohibition of unlawful eviction and unlawful deprivation of land, forest and waters

#### Protection against abuse through security forces - sec. 2 (2) no. 11

- Prohibition of the hiring or use of private or public security forces that, due to lack of instruction or control, disregard the prohibition of torture or cause injury to life or limb, or interfere with freedom of association

#### Protection of other human rights - sec. 2 (2) no. 12

- The prohibition of an act or omission, which is directly capable of impairing a protected legal position in a particularly serious manner and the unlawfulness of which is obvious on a reasonable assessment of all the circumstances under consideration."

## ENVIRONMENTAL RISKS

Handling of mercury - sec. 2 (3) no. 1 – 3

- Prohibition of the manufacture of mercury-added products
- Prohibition of the use of mercury and mercury compounds in manufacturing processes
- Prohibition of treatment of mercury waste

Handling of persistent organic pollutants - sec. 2 (3) no. 4 – 5

- Prohibition of the production and use of certain chemical pollutants
- Prohibition of non-environmentally sound handling, collection, storage and disposal of certain wastes

Handling of hazardous waste - sec. 2 (3) no. 6 – 8

- Prohibition of export of hazardous waste and other waste (according to the Basel Convention)
- Prohibition of export of hazardous waste depending on state of export and import
- Prohibition of import of hazardous waste and other waste

-End of Appendix-