

WHISTLEBLOWING POLICY & GUIDELINES

"The reputation of the Allianz Group is based on the trust which our customers, shareholders, employees and the general public have in the integrity of Allianz¹"

In accordance with the Allianz Code of Conduct, which encourages employees to speak up where they become aware of any activity which may be deemed improper or illegal, employees should be confident that they will not be subject to any form of retaliation, provided the matter was raised in good faith, even if after investigation it proves to be unfounded.

The aim of a Whistleblowing Policy:

The aims of this policy are:

- (a) to encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- (b) to provide staff with guidance as to how to raise those concerns; and
- (c) to reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- (a) criminal activity;
- (b) miscarriages of justice;
- (c) danger to health and safety;
- (d) damage to the environment;
- (e) failure to comply with any legal or professional obligation or regulatory requirement, including FCA rules;
- (f) facilitating tax evasion;
- (g) bribery;
- (h) financial fraud or mismanagement;

¹ Allianz Guideline on Whistleblowing (Speak-up) – V 2.0, 01.12.2012

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- (i) negligence;
- (j) breach of our internal policies and procedures, including our code of conduct;
- (k) conduct likely to damage our reputation or financial wellbeing;
- (l) unauthorised disclosure of confidential information; and
- (m) the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities you should report it under the policy.

Who does this policy apply to?

This policy applies to all individuals working for the Company in whatever capacity. This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure or the Anti-harassment and Bullying Policy if appropriate. If you are uncertain whether an issue is within the scope of this policy you should seek advice from the HR Department.

The key elements of this policy

All employees are protected from victimisation, harassment or disciplinary action as a result of any disclosure, where the disclosure is made in good faith and is not made maliciously or for personal gain. Where disclosures are made in the public interest, staff will have statutory protection under the Public Interest Disclosure Act 1998 (PIDA)

This policy is not designed for nor intended to encourage or solicit malicious, defamatory or inaccurate information. Nor does it encourage anyone to break the law or to breach data protection legislation.

Disclosures will be investigated fully including interviews with all the witnesses and other parties involved.

Anonymity:

Employees should where possible make disclosures internally and in such cases, anonymity, if sought, can be protected in any internal investigation.

Anonymity cannot be guaranteed however if external legal action flows from the disclosure.

If the employee prefers to make a disclosure outside the company, we cannot be accountable for maintaining anonymity.

Whilst the company encourages whistleblowers to identify themselves, anonymous disclosures will nevertheless be taken seriously and investigated fully. However, the effectiveness of any whistleblowing enquiry may be limited where an individual chooses not to be identified and we cannot contact you to notify you of the outcome of any investigation or action taken.

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Protection for employees:

In line with PIDA, Allianz Partners undertakes to protect you from any personal claims, victimisation, harassment or bullying which happens as a result of your disclosure. Our aim is that the career of any notifying employee should not in any way be harmed or hindered as a result of their act, whether the item reported proves to be true or not, provided the reporting was carried out in good faith.

A hostile action against any employee who has made a disclosure under this policy, whether the perpetrator of the hostility is affected by the disclosure or not, will be regarded as gross misconduct and the perpetrator may face disciplinary action under the Company Disciplinary and Dismissal Procedures.

It is particularly important that all concerns relating to the health & safety of anyone (whether employee, contractor or visitor) on our premises or at an Assistance are reported. If you become aware of a hazard or dangerous occurrence, you are expressly required to notify your line manager and a member of the Company Health & Safety Committee **before** making any other report - e.g. to an outside body - not least so that immediate action can be taken if necessary to remove/rectify the hazard.

Failure to notify, when reasonably aware or certain, of any matter relating to the safety of anyone is regarded by the Company as misconduct as it effectively it makes you an accessory to the occurrence.

If you have any queries regarding this policy please contact a Human Resources Business Partner.

Procedure for reporting and investigation

Raising a concern

We hope that in many cases you will be able to raise any concerns with your Manager. You may be able to tell them in person or put the matter in writing if you prefer. They may be able to agree on a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the HR department.

Where the matter is more serious, or you feel that your Manager has not addressed your concern, or you prefer not to raise it with them for any reason you should contact the HR department directly.

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. You may be required to attend meetings in order to provide further information. We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us from giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

The Company deems as unacceptable any provocative, malicious, injurious or similar acts. If we conclude that you have made false allegations maliciously or with a view to personal gain, you will be subject to disciplinary action.

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this. If you are not happy with the way in which your concern has been handled, you can raise it with the Group Integrity Committee.

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You may wish to contact one of the people listed below who have been nominated for this purpose:

- James Bonnett- Compliance Executive
- Head of UK Compliance – Samantha Wilson (07825963307 – these calls are not recorded)

Online: an anonymous and untraceable online method is accessible from the link below. This link although provided from the Allianz Partners Group Intranet takes you directly to the online reporting page and is not recorded on the Group Intranet:

<http://www.srvopano.com/Home/HiddenJacobson>

Confidentiality

We understand that in some situations, confidentiality is of great importance to an individual who is raising concerns. If you want to raise your concerns confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the HR department and appropriate measures can then be taken to preserve confidentiality.

External: Compliance Department at Allianz Compliance:

You may wish to pursue the matter within the Group but outside this Business Unit, in which case your matter may be referred to the Allianz SE Compliance Department accessed via the following links:

Speak Policy and Procedure: [Allianz Speak-Up Policy Information](#)

Confidential Report Form: <https://Allianz SE Report Form>

External Disclosures:

If you are concerned about something at work which is relevant to the Financial Conduct Authority (FCA), you are encouraged to initially raise your concern as detailed above.

If however, you have already disclosed your concern internally and you are concerned by the response or lack of it, or if you feel unable to talk to anyone internally or at HQ, you can contact the FCA.

PIDA protects you if you contact the FCA where:

1. You satisfy the test for speaking to your employer (see above);
2. You reasonably believe the information and any allegations in it are substantially true; and
3. You reasonably believe the FCA is responsible for the issue in question

FCA Contact details:

Direct Whistle-blowing number is 020 7066 9200

Direct e-mail address is whistle@fca.org.uk

Website address: <http://www.fca.org.uk/site-info/contact/whistleblowing>

FCA Address: Intelligence Department (Ref PIDA); The Financial Conduct Authority; 25 The North Colonnade; Canary Wharf; London E14 5HS

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External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will be very rarely, if ever, appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

Although whistleblowing concerns normally relate to internal matters, occasionally they can relate to third parties, such as customers, suppliers or service providers. In such situations, we would still encourage you to report such concerns internally first, either to your Manager or to the HR department.

Support

We are determined that staff must not suffer any detrimental treatment as a result of raising a genuine concern under this policy. Detrimental treatment includes dismissal, disciplinary action, threat or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR department immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

At no time staff members can threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action, and could in some cases be sued by the whistleblower and ordered by an employment tribunal to pay compensation.

Contacts:

HR Department

HR department – humanresourcesuk@allianz.com

Protect (independent whistleblowing charity) helpline:

www.protect-advice.org.uk/contact-protect-advice-line

Financial Conduct Authority

Telephone: 0207 066 9200

E-mail: whistle@fca.org.uk

Post: Intelligence Department (Ref PIDA) Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN

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