

# SpeakUp@Allianz

Whistleblowing System

## Rules of Procedure

for the complaints procedure in accordance with the  
German Supply Chain Due Diligence Act

for affiliated companies of  
Allianz in Germany <sup>1</sup>

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<sup>1</sup> For a list of companies, see Appendix 3

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## **1. How to use the whistleblower system for complaints under the German Supply Chain Due Diligence Act (GSCA)**

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

These Rules of Procedure explain in detail and in a language that is easy to understand what you can do if you wish to make a report on human rights or environmental risks or on violations of our due diligence obligations under the German Supply Chain Due Diligence Act.

If you have any such information concerning an Allianz company or its (in)direct suppliers, we encourage you to report this to us.

A list of the relevant risks according to GSCA can be found in Annex 2 of this document.

With the SpeakUp@Allianz whistleblower system, we offer simple ways to report concerns. The whistleblower system also 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 reduce the corresponding risk in the future.

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

## **2. How can complaints be reported to us?**

For complaints regarding

- human rights or environmental risks, as well as
- possible breaches of the due diligence obligations under the German Supply Chain Due Diligence Act by Allianz or its direct or indirect suppliers

you can use all the reporting channels of our whistleblowing system listed on the following page.

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

Regardless of how you submit your concern, it will be handled with the utmost due diligence, independence and confidentiality.

## Reporting channels of the whistleblowing system

	<p>With the internet-based <a href="mailto:SpeakUp@Allianz">SpeakUp@Allianz</a>, the Allianz Group offers a modern option that you can use to report – even anonymously.</p> <p><a href="mailto:SpeakUp@Allianz">SpeakUp@Allianz</a> enables a secure and confidential communication between the whistleblower and Compliance via an anonymized postbox.</p> <p>For further details on its use, see Appendix 1</p>	<a href="mailto:SpeakUp@Allianz">SpeakUp@Allianz</a>
	<p>via email</p>	<a href="mailto:interne.untersuchungen@allianz.de">interne.untersuchungen@allianz.de</a>
	<p>via letter</p>	<p>Allianz SE Group Compliance German Desk Dieselstr. 6-8 D-85774 Unterföhring</p>
	<p>via our <b>trusted Lawyer</b></p> <p>André-M. Szesny is an external lawyer who will also advise you and protect your identity if requested.</p>	<p>You can reach André Szesny at</p> <p>phone: +49 (0)211 600 55-217 mobile: +49 (0)179 475 60 74 email: <a href="mailto:a.szesny@heuking.de">a.szesny@heuking.de</a></p>

This complaints procedure applies to the companies listed in Annex 3 and is in the responsibility of Group Compliance German Desk, where the reports received in the whistleblowing system are expertly examined.

If requested, you can also report an incident personally to the German Desk's Compliance team. Please let us know if you wish to do so via one of the above-mentioned channels of the whistleblowing system so that we can contact you. If your report relates to a company outside the affiliate companies of Allianz in Germany (see list Appendix 3), you can find further information on the following [Allianz Group website](#)<sup>2</sup>

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

- The Allianz Group Code of Conduct [[Allianz Code of Conduct](#)]<sup>3</sup>
- The Allianz Supplier Code of Conduct [[Supplier Code of Conduct](#)]<sup>4</sup>

<sup>2</sup> <https://www.allianz.com/en/about-us/strategy-values/compliance/voice-your-concerns.html>

<sup>3</sup> [https://www.allianz.com/content/dam/onemarketing/azcom/Allianz\\_com/about-us/strategy-values/compliance/code-of-conduct/en-Code-of-Conduct-AllianzGroup-2020.pdf](https://www.allianz.com/content/dam/onemarketing/azcom/Allianz_com/about-us/strategy-values/compliance/code-of-conduct/en-Code-of-Conduct-AllianzGroup-2020.pdf)

<sup>4</sup> [https://www.allianz.com/content/dam/onemarketing/azcom/Allianz\\_com/sustainability/AllianzVendorCodeofConduct.pdf](https://www.allianz.com/content/dam/onemarketing/azcom/Allianz_com/sustainability/AllianzVendorCodeofConduct.pdf)

### 3. Who can report?

The reporting channels of our whistleblowing system are open to anyone who works for Allianz as well as for anyone inside or outside Allianz who wants to provide information on risks concerning human rights or environmental risks as well as violations of due diligence obligations in accordance with the German Supply Chain Due Diligence Act. It is not necessary to be personally affected, a complaint can also be made on behalf of third parties.

### 4. 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 existing 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, you can submit your report via one of the following channels:

- a) The online reporting tool [SpeakUp@Allianz](mailto:SpeakUp@Allianz), where we can stay in touch with you via a secure mailbox that is only accessible to the whistleblower. See Appendix 1 for more information.
- b) Through the trusted lawyer who will protect your identity if requested.

#### 4.1. Receipt of a report

We will confirm the receipt of your report within seven days after the report has reached us via one of the reporting channels mentioned under point 2.

#### 4.2. 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.

#### 4.3. Examination

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

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

#### 4.4. Corrective measures

Allianz 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 direct or indirect supplier, Allianz will seek to achieve the same results wherever possible. The relevant requirements of the GSCA are taken into account.

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 supplier company of Allianz, the measure will depend on Allianz' ability to influence the situation.

#### 4.5. 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.

#### 4.6. Conclusion of the procedure

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

The reported risk or suspected violation

- was not confirmed, or
- had already been resolved, or
- was addressed by the measures taken.

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

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

Allianz 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.

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 Procedure-

## 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 2024, 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: [SpeakUp@Allianz](#)<sup>5</sup>.

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 postbox to communicate with the responsible Allianz examiner.

To set up and access the personal secure postbox, you can choose any username, together with a personal code and store both carefully. You will use it for further communication with us. 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, especially for complaints according to the German Supply Chain Due Diligence Act you prefer to choose the category "Human Rights Violations". This makes it easier to assign your report as quickly as possible.
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 postbox. You will receive feedback from us via this postbox, including answers to any and information about the progress of your report. If you have set up a secure postbox, 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 SpeakUp@Allianz tool will protect your anonymity.

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<sup>5</sup> <https://www.bkms-system.com/bkwebanon/report/clientInfo?cin=by94UJ&c=-1&language=eng>

## 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 or one of its suppliers 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 or harm 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

### **Appendix 3: List of relevant companies**

These Rules of Procedure apply to the following Allianz companies in Germany and their subsidiaries:

Allianz Beratungs- und Vertriebs-AG

Allianz Versicherungs-AG

Allianz Lebensversicherungs-AG

Allianz Private Krankenversicherungs-AG

Allianz ONE – Business Solutions GmbH

Allianz Kunde und Markt GmbH

-End of Appendix-

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