

Allianz Complaints Mechanism

Rules of Procedure

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

for affiliated companies of
Allianz in Germany ¹

¹ For a list of companies, see [Appendix 3](#)

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1. The complaints procedure 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 our business relationships. Our purpose - "We secure your future" – commits us to long-term thinking and sustainable actions.

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

- The [Allianz Group Code of Conduct](#)²
- The [Allianz Vendor Code of Conduct](#)³

These Rules of Procedure explain in detail and in clear and accessible language 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 matter to us.

A list of the relevant risks according to GSCA can be found in [Appendix 2](#) of this document.

With the Allianz complaints mechanism, we offer different ways to report concerns. For detailed information on available reporting channels see chapter [2](#).

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

Your report enables us to address potential violations, provide support to the people affected, and enhance our preventive measures. It also helps us to mitigate the risk of future misconduct.

[Thank you for helping us to live up to our commitments!](#)

² <https://www.allianz.com/en/about-us/strategy-values/compliance.html#codeofconduct>

³ https://www.allianz.com/content/dam/onemarketing/azcom/Allianz_com/about-us/strategy-values/compliance/Allianz_Vendor-Code-of-Conduct.pdf

2. How can complaints on GSCA 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.

Relevant risks according to GSCA are listed in detail in [Appendix 2](#).

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

Please note: Should you wish to report anonymously, you may use in particular one of the following reporting channels:

- the [Allianz Whistleblowing Tool](#), which allows us to communicate with you via a personal, secure mailbox, which is accessible only for the reporting person. For details of handling please see [Appendix 1](#)
- the trusted lawyer, who protects your identity if required.

You can also report personally to the German Desk's Compliance team, if needed. 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](#)⁴

⁴ <https://www.allianz.com/en/about-us/strategy-values/compliance/voice-your-concerns.html>

3. Who can report an incident?

The [Allianz Whistleblowing Tool](#) as well as all other reporting channels mentioned above are open to all individuals working 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, transparent and effective process for dealing with reported complaints. We examine all reports with the same diligence and in compliance with the applicable legal requirements and applying defined standards.

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.

Every case is unique, making it difficult to determine the exact duration of the process in advance. Nevertheless, we are dedicated to addressing your complaint promptly and efficiently, with a focus on mitigating risks at the earliest opportunity.

Below you will find an overview of the steps that we follow to manage reported incidents, regardless of the channel through which they are submitted.

4.1. Process steps

a) Receipt of a report

We will confirm the receipt of your report within seven days after the report has reached us, provided that the selected reporting channel allows for communication with you. For description of available reporting channels see chapter [2](#).

b) Assessment of the reported incident

Independent examiners in the responsible Compliance team will review the report and may reach out to for additional information, provided that the selected reporting channel allows for communication with the reporting person.

c) Examination

Trained staff in the responsible Compliance team will examine the reported incident comprehensively. If deemed necessary, the Compliance team will contact you to discuss the incident.

Depending on the nature of the reported incident, additional Allianz experts (e.g. from Human Resources, Procurement, Sustainability or Data Privacy) may need to be involved in the review process. Information will only be shared in strict adherence to the principles of confidentiality, protection of the reporting person's identity and data protection requirements ("need-to-know"-principle).

d) Corrective measures

Allianz is dedicated to implementing appropriate and effective measures to address any confirmed incident.

If a violation or risk occurs within Allianz's own business operations, steps will be taken to mitigate the risk and cease the violation. In cases where the reported violation or risk involves a direct or indirect supplier, Allianz will strive to achieve the same outcomes wherever feasible.

The specific measures taken will depend on the nature and severity of the violation or identified risk. In case the reported violation or risk involves a supplier of Allianz, the measures will depend on Allianz' ability to influence the situation.

e) Communication with the reporting person during the examination

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

At the latest three months after receiving your report, we will provide you with feedback. If the investigation of the incident requires more than three months, we will maintain communication with you to the extent possible.

f) Conclusion of the procedure

The investigation of an incident may 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 appropriate measures taken.

5. How is a reporting person protected?

Allianz does not tolerate retaliation against anyone who reports an incident in good faith. "Good faith" means that at the time of submission of the report the reporting person had a reasonable belief that the information provided regarding the reported incident was accurate.

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

If you experience any form of retaliation as a result of your report, please do not hesitate to reach out to us either through the [Allianz Whistleblowing Tool](#) or via any of the other channels described in Chapter 2.

6. Who is responsible for the complaints procedure?

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

The webbased reporting channel, [Allianz Whistleblowing Tool](#) 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.

The effectiveness of these Rules of Procedure is assessed annually.

- End of the Rules of Procedure-

Appendix 1: The Allianz Whistleblowing Tool and how to use it

The Allianz Whistleblowing Tool allows you to notify Allianz of a breach of rules (or in defined cases the risk of a such). You can either provide your name or send the report anonymously.

The tool is available in all countries in which we operate. In 2026, the tool is available in German, English, and 70+ additional languages.

You can reach the Allianz Whistleblowing Tool here :

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

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.

The Allianz Whistleblowing Tool provides a personal secure postbox that allows you to communicate (anonymously) with the responsible Allianz examiner.

This personal secure mailbox is automatically created during the reporting process. It is essential that you save your individual report number and password. Allianz examiners will have access to the information you provide but will not be able to identify you personally unless you choose to disclose your identity or include information and/or (meta-)data, which enables identification.

There are steps in the reporting process:

1. First, select the language in which you want to create your report.
2. On the following page, your individual report number will be displayed. You will be required to create a password to ensure that only you can access your report. Please make sure to securely save both the report number and your password, as they cannot be recovered.
3. On the third page, you will be asked to select the category that best describes your report, such as "human rights violation". This helps us process your report efficiently. If the incident you wish to report does not fit into any of the categories listed in the Allianz Whistleblowing Tool, or if you are unsure which categorie to choose, please select the category "any other violation of law or violation of regulations".
4. On the fourth page, you can describe your concern in your own words. The free text field allows for up to 50,000 characters. Additionally, you may upload files to support your report. Please note that uploaded documents may contain metadata that could reveal information about the author. Once you submit your report, you will receive a reference number as confirmation of submission.
5. Your report is then sent to Allianz.
6. On the final page, your individual report number will be displayed again. You will also have the option to provide an email address to receive automatic notifications from the

Allianz Whistleblowing Tool if messages have been sent to your personal secure mailbox. Your email address will remain private and will not be shared with Allianz. Feedback, including responses to your questions and updates on the progress of your report, will be provided via your secure mailbox.

7. You can access your secure postbox directly via the "Access Report" button on the landing page of the Allianz Whistleblowing Tool. To log in, you will need to enter your 8-digit individual report number and the password you created.

Note that the technology behind the Allianz Whistleblowing Tool is designed to protect your anonymity as long as you do not provide any information or (meta)data that could reveal your identity.

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 enslaving 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 chemicals 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

-End of Appendix-

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