

# Allianz

# Whistleblowing Tool

## **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

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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 explain in detail and in clear and accessible language what you can do if you have information that the Allianz Group is not meeting its commitments.

If you have information regarding potential violations of laws, regulations, or internal policies by an employee, an entity of the Allianz Group, or any of its suppliers, Allianz strongly encourages you to report this matter 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 [Allianz Whistleblowing Tool](#), we offer a straightforward and secure channel for reporting concerns. The tool is designed to help protect your identity. All reported incidents are handled impartially and effectively by our Compliance Teams, ensuring a thorough and fair review process.

Your report enables us to address potential violations, provide support to those affected, and enhance our preventive measures. Additionally, it plays a crucial role in mitigating the risks of future misconduct.

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

## 2. What kind of incidents can you report?

The type of incidents you may report include, but are not limited to:

- 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; and
- 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.

To learn more about the standards applicable to both Allianz and our suppliers, please refer to:

- Allianz Code of Conduct<sup>1</sup>
- Allianz Vendor Code of Conduct<sup>2</sup>

## 3. Who can report an incident?

Our Allianz Whistleblowing Tool, along with other reporting channels, is accessible to all individuals working for Allianz or its suppliers. It is also available to anyone, whether within or outside Allianz, who possesses information regarding potential or actual misconduct related to an employee, to any entity of the Allianz Group or their suppliers.

You are encouraged to report an incident even if you are not directly affected by it.

If you have been personally impacted, you may also request someone else to submit a report on your behalf.

## 4. How you can report?

You can submit reports either anonymously or by voluntarily disclosing your identity.

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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.pdf](https://www.allianz.com/content/dam/onemarketing/azcom/Allianz_com/about-us/strategy-values/compliance/code-of-conduct/code-of-conduct.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)

Regardless of the reporting channel you choose—whether via the Allianz Whistleblowing Tool, email, letter, or in person—your concern will be handled with the highest level of diligence and confidentiality.

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

- [Allianz Whistleblowing Tool](#)<sup>3</sup>

Please refer to [Appendix 1](#) for details and how to use the tool.

- via letter to the following address:

Allianz SE  
Group Compliance  
Koeniginstrasse 28  
80802 Munich  
Germany

You also have the option to report any incident in person directly to the respective Allianz Compliance Team in your country of residence. For contact details, please refer to the local Allianz website. Additionally, information about Allianz contacts worldwide can be accessed [here](#)<sup>4</sup>.

## 5. How do we deal with your report?

All reported incidents are handled impartially and effectively by our Compliance Teams, ensuring a thorough and fair review process in compliance with the applicable legal requirements.

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 we follow to manage reported incidents, regardless of the channel through which they are submitted.

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

<sup>4</sup> <https://www.allianz.com/en/about-us/company/contact.html>

Please note: Should you wish to report anonymously, we can communicate with you via a personal, secure mailbox when utilizing the [Allianz Whistleblowing Tool](#). Please refer to [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, provided that the reporting channel you selected allows for communication between the Compliance function and the reporting person.

#### 5.2 Assessment of the reported incident

The responsible Compliance team will review your report and may reach out to you for additional information, provided the reporting channel you selected allows for communication between the Compliance function and the reporting person.

#### 5.3 Examination

The responsible Compliance team will conduct a thorough examination of the reported incident. Depending on the nature of the incident, additional experts from the Allianz Group—such as those from People and Culture, Procurement, Sustainability, or Data Privacy—may be involved in the review process. Information sharing is guided by the “need to know”-principle. Information will only be shared in strict adherence to the principles of confidentiality, the protection of the reporting person’s identity, and compliance with data protection requirements.

#### 5.4 Corrective measures

The Allianz Group is dedicated to implementing appropriate and effective measures to address any confirmed incidents. 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 supplier, Allianz will strive to achieve the same outcomes wherever feasible.

The responsible Compliance team will, whenever possible and necessary, engage with you and/or the relevant parties to discuss corrective actions and proposed solutions.

The specific measures taken will depend on the nature and severity of the violation or identified risk. If the reported violation or risk involves a supplier of Allianz, the measures will be determined based on Allianz’s ability to influence the situation.

### 5.5 Communication with the reporting person during the examination

Provided that the reporting channel you selected allows for communication between the Compliance function and the reporting person we will provide you with feedback at the latest three months after confirming the receipt of your report. If the investigation requires more than three months, we will maintain communication with you to the extent possible.

### 5.6 Conclusion of the procedure

The examination of an incident may be concluded for various reasons, including:

- The reported violation or risk was not substantiated;
- The issue had already been resolved; or
- Appropriate measures have been implemented to address the incident.

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

Allianz maintains a zero-tolerance policy towards any form of retaliation against individuals who report an incident in good faith. "Good faith" means that the reporting person had a reasonable belief that the information provided regarding the reported incident was accurate.

This policy applies also in cases where an investigation 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 through the [Allianz Whistleblowing Tool](#) or via any of the other reporting channels mentioned 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.

The effectiveness of these Rules of Procedure is assessed annually.

- End of the Rules of Procedures-

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

The Allianz Whistleblowing 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 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.

These 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 category 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. 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.
6. If you have set up a secure postbox, you can access it 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 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.

End of appendix -

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