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Global Anti-Harassment and Anti-Discrimination Functional Guideline

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Authorization:

The content of this document has been reviewed and approved as follows:

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1.0	01.06.2021	Group HR and Group Compliance 31.03.2020	Allianz SE Board Member Renate Wagner 12.05.2021		

Executive Summary

- I. The Allianz Group (“Allianz”) is committed to respecting and promoting the highest standard of ethics as well as fostering a diverse and inclusive culture. This is also reflected in the Allianz Group Code of Conduct, which promotes the values of fairness, respect, transparency, integrity and responsibility.
- II. Allianz’s ambition is to offer equal opportunity to all Employees and to nurture a work environment free of Harassment (including but not limited to Sexual Harassment), Discrimination, Bullying and other Abusive Conduct of any kind. Such conduct will not be tolerated.
- III. Allianz prohibits any act of Discrimination and Harassment based on sex, gender, gender identity, sexual orientation, race, age, creed, color, national origin, ancestry, religion, pregnancy, disability, medical condition, veteran status, marital status, family status, parental status, any other protected characteristic, or any other consideration made unlawful by applicable law.
- IV. This *Global Anti-Harassment and Anti-Discrimination Functional Guideline* (“The Guideline”) is binding for all Allianz entities. The Guideline lies within the divisional responsibility of the Member of the Allianz SE Board of Management in charge of Group Human Resources as well as Group Compliance.

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A. Introduction

I. Rationale and Scope of Application

1. The Guideline establishes core principles to promote the highest ethical standards and a diverse and inclusive culture at Allianz.

The Guideline shall apply to all Allianz employees who have an employment relationship with an Allianz company ("Allianz OE" or "OE").

The respective Allianz OE's Board of Management is requested to ensure adherence to the Guideline within the OE and to communicate the Guideline to all employees.

2. If the Guideline or single items within the Guideline are in conflict with local law or regulations, the local law or regulations will prevail. In the Guideline, "employees" refers to all employees including all executives.

II. Authorization and Updates

1. Allianz SE's Member of the Board of Management with overall responsibility for Human Resources as well as for Compliance in the Group is the owner of the Guideline. The responsibility for maintaining and updating this document has been assigned to H6-GHR in seamless cooperation with H6-GC.
2. This Guideline will be reviewed regularly. All material changes need approval by Allianz SE's Member of the Board of Management in charge of HR and Compliance.

B. Guideline Details

It is the responsibility of every Employee to respect the rights of others, including co-workers. Allianz prohibits any act of Discrimination and Harassment based on sex, gender, gender identity, sexual orientation, race, age, creed, color, national origin, ancestry, religion, pregnancy, disability, medical condition, veteran status, marital status, family status, parental status, any other protected characteristic, or any other consideration made unlawful by applicable law.

Any Employee covered by this Guideline who engages in Harassment (including but not limited to Sexual Harassment), Discrimination, Bullying, or Abusive Conduct of any kind will be subject to remedial and/or disciplinary action, up to and including termination of employment without prior notice.

Employees (whether the actions are directed towards them directly or another Employee) are urged to report any instances of conduct which are inconsistent with this Guideline by notifying or filing a complaint.

No person covered by this Guideline will be subject to Retaliation for:

- Reporting conduct reasonably believed to be prohibited by this Guideline or applicable laws; or
- Providing information or otherwise assisting in any investigation of an alleged violation of this Guideline or applicable laws.

Allianz will not tolerate Retaliation against any Employee who, in good faith (i.e. sincerely and honestly), reports or provides information about a violation of this Guideline. Any person who engages in such Retaliation will be subject to disciplinary action, which may include termination of employment without prior notice.

I. Creating an Harassment- and Discrimination-Free Workplace

I.1. Employee Responsibilities

Every Employee has the right to be treated with respect and has a responsibility to treat others with respect.

Allianz's Employees can prevent Harassment and Discrimination by:

- Refraining from actions that may offend or embarrass others;
- Remembering to treat people as they wish to be treated and not as you would like to be treated;
- Letting others know that you do not approve disrespectful behaviors, such as offensive emails, inappropriate comments, derogatory cartoons and jokes;
- Participating in company learning opportunities related to fostering an Harassment- and Discrimination-free workplace environment.

Creating an Harassment- and Discrimination-free work environment is everyone's responsibility. All Employees should lead by example by demonstrating mutual respect and must not engage or participate in any harassing or discriminatory behaviors. It is Allianz's expectation that all Employees and Managers will take appropriate steps to prevent a Hostile Work Environment.

I.2. Manager Responsibilities

Managers are encouraged to deal with incidents of Harassment and Discrimination at the onset. While some level of professional conflict or disagreement among peers is a normal part of working life from time to time, certain forms of behavior – such as Harassment, Discrimination, Bullying or other Abusive Conduct – are never to be tolerated. It is important that Managers consistently set the tone for a respectful work environment. All Managers should lead by example by modeling respectful behaviors and not tolerating disrespectful and inappropriate behavior.

Managers must monitor the atmosphere in their workplace and pay close attention to the tone of interactions and comments made between Employees and co-workers. They should also pay attention to the use of derogatory and other inappropriate language or jokes, and check for increased absenteeism or staff turnover.

If an Employee tells a Manager that he/she has been harassed or discriminated against by another Employee, the Manager should:

- Meet with the employee promptly
- Listen to his/her concerns and not pass judgment; and
- Discuss the resolution options available depending on the situation, such as:
 - Arranging an informal discussion with the other Employee;
 - Meeting with the appropriate HR Business Partner;
 - Explain that the Manager must take further action.

All Managers who receive a complaint or information from another Employee about alleged Discrimination, Harassment, Bullying or other Abusive Conduct or who otherwise observe or suspect any of the same, are required to report such conduct promptly to Human Resources.

In addition to being subject to disciplinary action if they themselves have engaged in any acts which constitute Discrimination, Harassment, Bullying or other Abusive Conduct, Managers will be subject to disciplinary action for failing to report any such suspected conduct or otherwise knowingly allowing such prohibited conduct to continue.

Managers will also be subject to disciplinary actions for engaging in any form of Retaliation.

II. Complaints, Reporting and Investigations

If an Employee, or Manager experiences, observes or suspects that conduct prohibited by this Guideline has occurred, taking one or more of the following steps may be appropriate under the circumstances:

- Speak with the person about his/her behavior, if comfortable taking that step. Sometimes, people do not realize the impact that their behaviour and actions have on others and perception is key to determine if a particular statement or conduct could be considered Abusive Conduct.
- If this is not successful in stopping the behavior, or if the Employee is not comfortable speaking with the person involved, the Employee can talk with his or her Manager, or with the designated HR Business Partner.
- Report the incident using Allianz's designated confidential reporting channels (local Compliance function, or OE confidential integrity line, or the Allianz Group anonymous integrity line, or send an email to Group Compliance).

Complaints or information provided about any alleged Discrimination, Harassment, Bullying or Abusive Conduct will be investigated, if the allegation is found reasonable, whether the information was reported in verbal or written form.

Employees may be required to cooperate as needed in an investigation of alleged prohibited conduct. Allianz will not tolerate Retaliation against Employees who participate in an internal or external investigation regarding an alleged violation of this Guideline.

While the process may vary from case to case depending on the circumstances, investigations will be conducted in accordance with the principles set out in the Allianz Guideline on Internal Investigations and in the Allianz Guideline on Whistleblowing.

III. Confidentiality

Complaints will be handled confidentially, to the extent possible and consistent with applicable legal requirements, Allianz's policies and the need to conduct a proper investigation.

Only those people involved in the investigation will have access to the information collected, but only to the extent they need to know the information under the circumstances to conduct the investigation.

IV. Training Requirements

Trainings to Employees on certain aspects of this Guideline will be provided by Allianz on a need basis, in addition to the requirement by applicable laws to conduct specific trainings in certain office locations of Allianz. The required content and frequency of such trainings will be no less than what is dictated by applicable laws, which also typically specify which Employees or Managers must attend the relevant training.

V. Liability for Unlawful Discrimination and Harassment

Any Employee or Manager, who is found to have engaged in Harassment (including Sexual Harassment), Discrimination, Abusive Conduct or Retaliation in violation of this Guideline will be subject to disciplinary action, which may include the termination of employment for cause without prior notice. An Employee who engages in such behaviour in violation of applicable law also may be held personally liable for monetary damages and/or subject to criminal prosecution.

Allianz will not pay any claims, damages, liabilities, losses, costs or expenses (including but not limited to attorneys' fees) assessed personally against an Employee who engages in any conduct prohibited by this Guideline.

VI. Legal Protections and External Remedies

For the avoidance of doubt, Harassment, Discrimination, Bullying and Abusive Conduct are not only prohibited by this Guideline, but also may be prohibited by applicable laws. Employees may choose to pursue legal remedies directly with law enforcement or governmental agencies or authorities having jurisdiction over such matters.

C. Annex: Definitions and Examples of Prohibited Conduct

Note: The below terms and definitions are intended to provide a typical description of some of the terms and behaviors referred to in this Guideline but each case will need to be assessed individually looking at each case's own facts and circumstances.

Abbreviation / Term	Description
"Abusive Conduct"	Any form of conduct that a reasonable person would find hostile, offensive, and unrelated to Allianz's legitimate business interests. Abusive conduct may include, among other things: infliction of verbal abuse, such as the use of derogatory remarks, insults, and epithets; verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating; or the sabotage or undermining of a person's work performance or career; and other conduct that is in violation of applicable law.
"Adverse Action"	An action taken to try to keep someone from opposing a discriminatory practice, or from participating in an employment discrimination proceeding. Examples of adverse actions include: <ul style="list-style-type: none"> - Employment actions such as termination, refusal to hire, and denial of promotion. - Actions affecting employment such as threats, unjustified negative evaluations, unjustified negative references, or increased surveillance. - Any other action such as an assault or unfounded civil or criminal charges that are likely to deter reasonable people from pursuing their rights.
"Allianz"	Allianz SE and its branch offices and subsidiaries across the Group.
"Bullying"	<p>Bullying is repeated, health-harming mistreatment of one or more persons (the targets) by one or more perpetrators in the workplace. It is abusive conduct that is:</p> <ul style="list-style-type: none"> - Threatening, humiliating, or intimidating, or - Work interference – sabotage – which prevents work from getting done, or - Verbal abuse <p>This type of behavior has the intent to hurt, threaten or frighten another person.</p> <p>It can include verbal abuse, verbal or non-verbal threats, physical assault, stalking or other methods of coercion such as manipulation, blackmail, or extortion.</p> <p>Bullying does not include:</p> <ul style="list-style-type: none"> - A single episode of social rejection or dislike; - A single act of nastiness or spite; - A random act of aggression or intimidation; or - A disagreement or fight. <p>While these actions can cause great distress, they do not fit the definition of bullying, and they are not examples of bullying unless someone is deliberately and repeatedly doing them.</p>

<p>“Discrimination”</p>	<p>Discrimination refers to unequal or unfair treatment of an individual or a group, based on certain characteristics protected by law (including but not limited to sex, gender, gender identity, sexual orientation, race, age, creed, color, national origin, ancestry, religion, pregnancy, disability, medical condition, veteran status, marital status, family status, parental status, any other protected characteristic or any other consideration made unlawful by applicable law). It can include physical, verbal or non-verbal conduct.</p> <p>Examples of discrimination include, but are not limited to:</p> <ul style="list-style-type: none"> - Harassment – inappropriate jokes, insults, name-calling or displays such as posters or cartoons directed at a person because of that person’s race, color, sex or gender, sexual orientation, etc.; - Hiring discrimination – refusal to employ or continue to employ based on a person’s protected characteristics; - Wage discrimination – paying lower compensation to one person than to another based on a person’s protected characteristics where they are both performing similar work and have similar performance, backgrounds and professional experiences; and - Discrimination due to disability - terminating an Employee who is injured and in need of time off to heal (discrimination based on disability and the duty to accommodate). <p>Discrimination would not include:</p> <ul style="list-style-type: none"> - Different treatment or work assignments based on past performance results of Employees. - Negative evaluations that are justified by an Employee’s poor performance or history.
<p>“Employee(s)”</p>	<p>As used in this Guideline, the term “Employee” means a full-time or part-time employee, an applicant for employment or an intern (whether paid or unpaid) of Allianz.</p>
<p>“Harassment”</p>	<p>Unwelcome comments or conduct which are abusive, offensive, demeaning or vexatious that are known or ought reasonably to be known to be unwelcome and which relates to that person’s race, creed, color, religion, sex, pregnancy, disability, medical condition, national origin, ancestry, age, sexual orientation, veteran status, gender, marital status, family status, parental status or any other protected characteristic. It can include physical, verbal or non-verbal conduct. Harassment may be intended or unintended.</p> <p>Examples of harassment may include, among other things:</p> <ul style="list-style-type: none"> - Spreading false or damaging rumors or gossip about an Employee; - Displaying or sending sexist, racist or other offensive pictures or emails; - Actual or threatened physical assault; - Threatening or bullying; and - Insulting gestures. <p>Harassment generally does not include:</p> <ul style="list-style-type: none"> - Opinions expressed that are different from someone else’s; - A Manager making reasonable and appropriate assignments of work to Employees; - Legitimate feedback regarding work or performance of an Employee; or - Disciplining Employees in a reasonable and appropriate manner.

“Hostile Work Environment”	<p>There is no single definition of a “hostile work environment.” The determination of whether a hostile work environment exists is subjective and depends on the facts and circumstances of each case. However, a hostile work environment is generally one that typically is created by a Manager or Employee whose conduct is intentional and unwelcome, discriminatory against a protected group of people, severe, recurring and/or pervasive. The conduct also must interfere with an Employee’s ability to perform his or her job. Such conduct also must alter the terms, conditions, and/or reasonable expectations of a comfortable work environment for Employees.</p> <p>For example, a hostile work environment can arise from the above types of conduct which also involve:</p> <ul style="list-style-type: none"> - Sexual harassment; - Persistently telling jokes based on a person’s protected characteristics; - Assaulting, threatening or touching a person without permission, even if the contact is not sexual in nature and occurs only once; - Mocking people for their physical or intellectual disabilities; - Mistreating people who suffer from emotional distress or mental illness; or - Constantly insulting people, especially while using crude and foul language. <p>For a work environment to be illegally hostile, it needs to go beyond minor inconveniences, casual joking and general rudeness. A hostile work environment generally would not be created by:</p> <ul style="list-style-type: none"> - Isolated incidents; - Loud, rude or simply annoying Managers or co-workers; or - The lack of perks, privileges, benefits, and/or recognition.
“Manager”	An Employee who oversees and/or manages one or more Employees.
“Reasonable Person”	This refers to the general legal concept whereby a reasonable person is a composite of a relevant community’s judgment as to how a typical member of that community should behave in situations that might pose a threat of harm (through action or inaction) to others.
“Retaliation”	<p>Retaliation includes any Adverse Action taken against an Employee for reporting a concern, filing a complaint, or supporting another Employee’s complaint.</p> <p>An employer cannot retaliate against an Employee who has engaged in a protected activity. This means that an Employee may speak up if he or she sees a red flag for Abusive Conduct, Bullying, Harassment, or Discrimination.</p>
“Sexual Harassment”	Sexual harassment is any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. While typically involving a pattern of behavior, it can take the form of a single incident. Sexual harassment may occur between persons of the opposite or same sex. Both males and females can be either the victims or the offenders.

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