



Policy Statement of Allianz SE on the implementation of human rights and environmental due diligence

as required by the German Supply Chain Due Diligence Act
Version 2 | January 2025

Foreword

Allianz is one of the world's leading insurers and asset managers, with more than 127 million private and corporate customers in more than 70 countries. In 2024, Allianz employed almost 160,000 people around the world. Allianz SE, the parent company of Allianz Group, is headquartered in Munich, Germany, while Allianz Group has entities in over 50 countries around the world.

At Allianz, we are committed to human rights

At Allianz, we recognize the importance of human rights as both a value-based topic and a business issue. Allianz is committed to

- supporting and respecting the protection of international human rights
- ensuring that Allianz is not complicit in human rights abuses.

Allianz aims to identify, prevent, mitigate, or remediate adverse human rights impacts linked to our business activities and operations, including our supply chain. Our approach has been guided by the OECD Guidelines for Multinational Enterprises and the U.N. Guiding Principles on Business and Human Rights.

The human rights¹ that Allianz is committed to respecting are those agreed by governments in

- the International Bill of Human Rights: this consists of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights and its two Optional Protocols
- the core International Labor Organization (ILO) Conventions; these include the prohibition of child labor and forced labor; freedom of association and the right to collective bargaining; occupational health and safety; and the elimination of discrimination in respect of employment and occupation.

Allianz has been a member of the U.N. Global Compact (UNGC) since 2002 and uses the UNGC principles as orientation for its business activities. For more details and Allianz' annual Communication on Progress, see the [UNGC website](#).

At Allianz, we strive to continuously improve our human rights due diligence processes, including through monitoring by our Allianz Group Human Rights Officer, established in 2023.

From 2025, we are reporting on our human rights objectives, due diligence processes, and measures in our Sustainability Statement, which is part of our Annual Report and is subject to an audit to the level of reasonable assurance.²

Our commitment to human rights extends across our value chain. For our commercial insurance and our proprietary investments, human rights due diligence processes are an integral part of our overall sustainability approach. We use a combination of sector- and country-specific approaches, as well as company-specific research to identify human rights risks. Our due diligence processes for commercial insurance and proprietary investments are published in detail in the "Sustainability Integration Framework".³

This policy statement is based on the requirements of the German Supply Chain Due Diligence Act (GSCA) and hence covers the due diligence processes in own operations and supply chains of Allianz SE.

This policy statement lays out:

- the due diligence processes that Allianz SE (as the holding company of the Allianz Group) has established for human rights and certain environmental risks at Group level in its own operations and supply chains
- the priority human rights and environmental risks identified for Allianz SE on the basis of the risk analysis
- the expectations that Allianz SE has towards employees and suppliers with regard to human rights and certain environmental conventions, as required by the GSCA.

The Board of Management of Allianz SE

1. Our Allianz due diligence processes according to the German Supply Chain Act

Worldwide scope

The German Supply Chain Act (GSCA) applies to large Germany-based companies and their “own business area”⁴. The own business area of Allianz SE as holding company of Allianz Group encompasses Allianz entities⁵ of over which Allianz SE exerts decisive influence. Therefore, our GSCA risk management covers all those Allianz entities and their suppliers worldwide.

The GSCA is directly applicable to all companies based in Germany with at least 1,000 employees. Therefore, in addition to Allianz SE as the parent company of Allianz Group, a further eight Allianz companies are directly subject to the GSCA.⁶ These eight companies have each defined their respective own business areas with associated suppliers. Each of these Allianz companies implements – in close coordination with Allianz SE – all GSCA due diligence obligations for their respective business areas, including the publication of their own policy statement.⁷

Elements of our risk management

The GSCA risk management for Allianz SE is designed to identify, prevent, mitigate, and eliminate human rights and certain environment-related⁸ risks and violations.

Our GSCA risk management framework consists of the following due diligence processes:

- regular and ad-hoc risk analyses in own operations and supply chains, the results of which are communicated to all relevant decision-makers
- appropriate preventive / remedial measures for risks / violations identified in own operations and supply chains
- a worldwide complaints mechanism
- a policy statement on our human rights strategy that is updated regularly
- monitoring of the risk management through the function of a human rights officer
- ongoing documentation of all due diligence efforts and compliance with reporting requirements.

We have created a methodology to analyze, weigh and prioritize risks that combines elements of Allianz' existing risk management frameworks with requirements of the GSCA and the responsible regulator, Bundesamt für Wirtschaft und Ausfuhrkontrolle (BAFA).⁹ This methodology is used in both own operations and supply chains.¹⁰

Roles and responsibilities

Dedicated human rights experts in our Global Sustainability function co-ordinate the implementation of human rights due diligence worldwide, whilst working closely with all relevant functions at Group level (including Global Sourcing & Procurement, Group People & Culture, Group Legal, Group Risk and Group Compliance) and our entities worldwide.

To implement the risk management in our entities, we have identified “GSCA risk experts” and “GSCA risk managers” in people and culture as well as procurement. They are responsible for identifying, analyzing, and prioritizing risks, and identifying violations as well as defining and implementing specific preventive and remedial measures and reviewing their effectiveness.

To fulfil these responsibilities, GSCA risk experts and managers received training on the human rights and environmental risk categories listed in GSCA Sec. 2 (see annex) as well as on the implementation of due diligence processes.

The Board of Management of Allianz SE has appointed a Group Human Rights Officer¹¹ to monitor the effectiveness of our GSCA risk management system worldwide. The Group Human Rights Officer regularly reports to the Allianz Sustainability Board¹² and the Board of Management of Allianz SE.

Based on her monitoring function, the Group Human Rights Officer assessed Allianz SE's GSCA risk management as appropriate and effective. Recommendations for selective improvements were communicated to the Allianz SE Board of Management and subsequently implemented.

Allianz SE continuously strives to further improve the effectiveness of its GSCA risk management.

1.1 Risk management in our own operations

Risks most relevant for our sector

Allianz is a financial service provider that offers insurance and asset management products in a highly regulated legal framework. We do not produce any goods in the traditional sense.

Generally, human rights risk associated with the own operations of this kind of business activity is rather low, compared with producing industries. This conclusion is supported by our research using publicly available data on sectoral human rights risks as well as by our GSCA risk assessments.

Similarly, the risks that the own operations of financial service providers cause severe environmental damage is assessed as modest. This applies in particular to the environmental prohibitions named in GSCA, such as the production, handling and disposal of certain highly toxic chemicals.

In order to gain an initial overview of the risk situation in our own operations, we analyzed all risks listed in GSCA taking into account sector-specific factors. We identified the following risk categories as potentially the most relevant for our own operations:

- occupational health and safety
- unequal treatment in employment
- freedom of association
- adequate wages.

Our risk assessments and the analysis of other data sources (e.g. internal surveys, complaints mechanism) have confirmed this prioritization.

At Allianz, we had already implemented extensive measures for these risk categories before GSCA, in line with global principles as well as local requirements and regulations. We regularly assess our measures with a view to improving them where necessary.

Extensive measures reflect our values

The obligation to respect human rights is part of the Allianz Group Code of Conduct. The Code of Conduct is designed to ensure responsible and ethical behavior within Allianz Group. All employees are expected to become familiar with the Code of Conduct and to apply these principles in their daily work (more in section 2).

We have implemented a series of further measures to minimize risks to relevant human rights and labor standards in our own operations:

- The protection of human rights, such as the prohibition of discrimination and harassment, occupational health and safety, the right to form and join trade unions, and adequate wages, have been enshrined in our internal corporate rules and guidelines, depending on local laws and requirements.
- Specifically, a binding corporate rule extends GSCA requirements in own operations to all relevant Allianz entities worldwide, including respect for the human rights listed in GSCA, the definition of clear responsibilities and the implementation of due diligence obligations. The people and culture function monitors compliance with this corporate rule.
- An online training about human rights is being made available to all Allianz employees worldwide. The training informs about relevant human rights and provides recommendations for managing human rights risks or violations. Furthermore, Allianz people managers worldwide are expected to complete a sustainability-related online training that also includes GSCA basics.
- Our annual “Allianz Engagement Survey” gives employees the opportunity to anonymously provide feedback on issues such as workload, wages, and diversity.
- With the “multi-rater” tool, employees can provide anonymous multi-dimensional feedback to executives and people leaders every year.
- To ensure that our employees are protected from unpredictable events, such as natural disasters or fires, we have a variety of alarm systems and evacuation plans in place, depending on local conditions and requirements.
- To support our employees’ physical health, we provide them with ergonomic workplaces and equipment.
- We offer our employees resources to help them manage work-related stress and increase their well-being, including our “Employee Assistance Programs” or our “Global Mindfulness Movement”.

In case we learn of any suspected or actual violations of human rights in our own operations, for example through our complaints mechanism, we will take immediate action to prevent or stop such violation and minimize its impact.

→ Read the [Allianz Group Code of Conduct](#)

→ Get more details on our People & Culture strategy in our [Allianz People Fact Book](#)

→ Learn more about [Diversity, Equity and Inclusion](#) at Allianz

→ Find details about our policies, actions and targets for GSCA-relevant rights in own operations in our [Sustainability Statement](#) (as part of our Annual Report).

Most risks were assessed as “low”

As part of the annual risk assessment, relevant Allianz entities have identified several hundred individual risks, predominantly in the four prioritized risk categories.

Among the four prioritized categories, our entities assessed ‘occupational health and safety’ as the most relevant, in particular:

- physical safety and emergency preparedness
- physical / mental health and well-being

In this and all other risk categories, most of the identified human rights risks have so far been assessed as “low”. Only a very small number has been assessed as “medium” or “high”.

Allianz entities that still assess some risks as “medium” or “high” take additional preventive measures to minimize them. Such measure can include, for example, additional employee training, updated emergency contingency plans, or measures to reduce the risk of excessive overtime. The relevant Allianz entities assess the effectiveness of such risk-based, specific preventive measures on a regular basis.

1.2 Risk management in our global supply chain

Most of our direct suppliers work in low-risk sectors

When the GSCA entered into force, we initially wanted to gain an overview of the overall human rights risk situation in our direct supplier base. For this, Global Sourcing & Procurement allocated global procurement spending to specific commodities and sector codes.¹³ We used publicly available as well as third party provider data to assess the risk levels in relevant sectors.

We concluded that around three-quarters of our total procurement spending is on low-risk sectors, such as IT, legal and other consultancy services. The remainder goes to medium-risk sectors, such as IT infrastructure or facilities management. Allianz does not buy goods or services from sectors that are, according to publicly available indices, associated with high human rights risks.

The abstract and concrete risk analyses carried out since have confirmed the conclusion that the overall human rights and environmental risk level in our direct supply chain is low.

Existing measures to address human rights and environmental risks in our supply chain

At Allianz we want to ensure respect for human rights and environmental protection not only in our own operations but also along our supply chain. We encourage our suppliers to take responsibility for human rights in their own operations and supply chains, notably through implementing due diligence procedures in line with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

To minimize human rights and environmental risks in our supply chain, we have established the following measures:

- An internal corporate rule sets out the core principles, responsibilities and organizational framework for sourcing and procurement that are binding for all relevant Allianz entities. This also includes the commitment to human rights due diligence in the supply chain. The Group procurement function monitors adherence to this rule worldwide.
- The Allianz Sustainable Procurement Charter sums up our sustainable procurement aspirations for Allianz, including our human rights approach. It provides guidance for both internal buyers and external suppliers. It strongly encourages all our suppliers to manage their own supply chains in line with the environmental, social and governance principles laid out in the Charter, to minimize risks further down in the Allianz supply chain (indirect suppliers).
- The Allianz Vendor Code of Conduct must be accepted by all companies that wish to participate in an Allianz tender and / or enter a contractual relationship with Allianz.¹⁴ Our Vendor Code of Conduct spells out our expectations towards our suppliers regarding human rights and employment standards as well as environmental due diligence (details in section 2).
- During the Allianz supplier onboarding, suppliers with whom we have larger order volumes must answer additional sustainability-related questions, including on their human rights due diligence processes. Suppliers that do not establish appropriate human rights due diligence in their operations and supply chains are subjected to an ad-hoc risk analysis.
- Suppliers that have been identified as potentially high risk can be asked to sign additional human rights-related contractual clauses.
- As additional evidence of our sustainability work with suppliers, our Net-Zero Transition Plan includes our commitment that our suppliers should have public net zero commitments in place from 2025.¹⁵
- If we find that human rights violations have occurred or are imminent at one of our suppliers, we take immediate remedial actions, in line with our ability to influence the respective supplier. We may enforce additional human rights-related contractual clauses or use other measures, depending on the type of violation. As a last resort, we will sever the business relationship with a supplier that persistently violates human rights.
- We assess the effectiveness of such preventive and remedial measures on a regular basis.

- Read the [Allianz Group Vendor Code of Conduct](#)
- Read the [Allianz Group Sustainable Procurement Charter](#)
- Our Allianz Net-Zero Transition Plan is also part of our [Sustainability Statement](#)

Identified risks were mostly procedural

For the annual risk analysis, Global Sourcing & Procurement compiles information on all direct suppliers of all entities that are part of the “own business area” of Allianz SE (see “Worldwide scope” above).

In line with a risk-based approach, we use abstract risk filters to focus on potentially higher risk suppliers. For this, we:

- identify the sector and country of every supplier based on invoicing data
- compile publicly available indices at country level, to identify the most relevant risk areas for individual countries
- construct a sector filter based on publicly available data and indices for sector-specific risks
- apply country and sector specific risk filters to screen out potentially high-risk suppliers from of the total population of direct suppliers.

For a concrete risk assessment, we contact all potentially high-risk suppliers with specific questions based on our send our proprietary GSCA risk questionnaire. GSCA risk experts in Global Sourcing & Procurement analyze the responses we receive.

So far, these analyses have indicated that risks to human rights and labor standards as well as environmental risks in the assessed companies were generally “low”.

Where we identified “medium” or “high” risks on the basis of the questionnaire, subsequent further investigation often showed that the risks were based on purely procedural aspects, for example that (smaller) suppliers could not demonstrate rules or due diligence processes for certain risk categories.

To identify possible violations of human rights and GSCA-relevant environmental rules, we use our risk assessments, relevant databases and adverse media screenings.

Our risk assessments so far indicate a low and diffuse risk level in our supply chain and do not allow us to prioritize certain risk categories for our work with suppliers.

2. What we at Allianz expect from our employees and suppliers

In line with our Allianz commitment to human rights, we expect our employees and our suppliers to also respect human rights.

What Allianz expects from its own employees

The Allianz Group Code of Conduct reflects our values and principles at Allianz and gives our employees guidance in their actions and decisions.

At Allianz, we expect employees to respect and protect human rights in line with international standards. We encourage our employees to be vigilant about any potential risks to human rights related to our operations or business activities.

In particular, we expect our employees to

- treat everyone fairly and with respect
- help create a fair environment where people can succeed regardless of gender, age, ethnicity, disability, religion, sexual orientation, or cultural background
- not make decisions related to employment – such as hiring, promotion, assigning work
- tasks, or dismissal – based on the characteristics mentioned above
- never accept bullying or harassment
- make sure they follow safety and security guidelines and avoid situations that could cause harm.

→ Read our [Code of Conduct](#)

What Allianz expects from its suppliers

We at Allianz expect all our suppliers to act with integrity and respect the rights of their own employees and other people who may be affected by the supplier's business activities.

In particular, we at Allianz expect our suppliers to

- ensure equal treatment, equal employment opportunities and equal pay for work of equal value
- not discriminate against employees on the basis of gender, age, ethnicity, disability, religion, sexual orientation, or cultural background
- prevent any form of threats, coercion, or harassment, including sexual harassment or corporal punishment
- respect legislation against child labor, and not enable any form of forced labor or human trafficking of involuntary labor through threat, force, fraudulent claims, or other coercion
- comply with all applicable labor laws, including those on compensation and working hours; and make an adequate effort to make sure their suppliers do the same
- respect workers' rights to freedom of association and collective bargaining in accordance with applicable local laws and regulations
- establish processes to enable them to identify key risks to human rights and labor standards.

At the same time, we expect our vendors to comply with all applicable environmental laws and regulations¹⁶, and, where appropriate, establish sustainability policies and environmental management practices that encourage environmental stewardship by their supply chain.

→ Read our [Vendor Code of Conduct](#)

→ Read our [Sustainable Procurement Charter](#)

3. Our complaints mechanism – SpeakUp@Allianz

Allianz has strengthened its existing worldwide complaints mechanism to make it fully compliant with Sec. 8 GSCA and BAFA guidelines¹⁷. Under the headline SpeakUp@Allianz, our complaints mechanism has the following features:

- It is accessible to Allianz employees, to the employees of Allianz' direct and indirect suppliers, and anyone else who might be impacted by the economic activities of Allianz.
- It enables people to draw attention to human rights and environmental risks as well as violations of human rights or environmental obligations that have arisen as a result of the economic activities of Allianz or of direct or indirect suppliers.
- The Allianz compliance experts responsible for handling the reports submitted through SpeakUp@Allianz are independent and observe confidentiality rules.
- Allianz does not tolerate any reprisals or any disadvantages for reporting persons related to their complaint.
- The Allianz complaints mechanism consists of several channels, including email, postal letter and an online reporting tool that allows the creation of anonymous mailboxes through which the reporting person can communicate with the responsible compliance experts. The tool is available in all countries in which Allianz operates. The tool is available in German, English and 19 additional languages.
- The rules of procedure for the Allianz complaints mechanism have been published in text form. They contain clear and comprehensible information on the process of reporting, the communication between the compliance experts and the reporting person as well as the investigation of incidents raised by the reporting person.

→ Learn more about the [Allianz complaints channels](#)

→ Read the [Rules of Procedure](#) for the Allianz SE complaints mechanism

→ Access our anonymous [SpeakUp@Allianz tool](#)

Annex

Human rights risks and environmental risks listed in GSCA

Allianz' due diligence obligations described in this document relate to the protected rights and environmental prohibitions listed in Sec. 2(2) GSCA.

We have paraphrased these rights and environmental prohibitions 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 (usually under 15) work instead of going to school
- require or accept that children (under 18) 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
- evict people from their land without proper legal procedures and compensation
- do (or fail to do) something that directly and seriously violates any other human right
- 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, sometimes called "forever chemicals")
- export toxic waste to countries that cannot properly dispose of it.

- ¹ Allianz is equally committed to protecting human rights and the environment. For details of our environmental and climate change policies, see our Sustainability Statement on Allianz.com [Allianz | Annual Report](#). The German Supply Chain Act requires that Allianz extends its GSCA due diligence to certain environmental risks as listed in Sec. 2 GSCA. Where appropriate, these risks are included in our due diligence processes as described in this document. A full list of GSCA protected positions is in the annex of this document.
- ² Allianz publishes its first Sustainability Statement under CSRD in March 2025 for the year 2024 [Allianz | Annual Report](#). Our reports under the following reporting standards are of particular relevance to our GSCA-related due diligence: 2 General disclosures, E2 Pollution, S1 Own workforce, S2 Workers in the value chain, S3 Affected communities.
- ³ The Allianz sustainability approach and processes for commercial insurance and proprietary investments is laid out in a binding internal corporate rule, the Allianz Standard for Integration of Sustainability. Publicly, the approach and associated due diligence processes are described in the [Allianz Sustainability Integration Framework](#). Both documents are updated regularly.
- ⁴ The definition of the “own business area” under GSCA differs from the definition of the “own business area” under CSRD.
- ⁵ Allianz “entities” here refers to “operating entities”. (Operating) entities are management units within a business segment irrespective of their legal forms and under Allianz control (as defined by German *Aktienrecht*). An OE can consist of one or more legal entities, or, conversely, one legal entity may comprise more than one OEs. Reference to an (operating) “entity” here is a reference to all legal entities and branches that form part of this (operating) entity.
- ⁶ The Allianz companies that, in addition to Allianz SE as the parent company of Allianz Group, are directly subject to the GSCA are Allianz Beratungs- und Vertriebs-AG, Allianz Global Corporate & Specialty SE, Allianz Global Investors GmbH, Allianz Lebensversicherungs-AG, Allianz ONE- Business Solutions GmbH, Allianz Private Krankenversicherungs-AG, Allianz Technology SE and Allianz Versicherungs- AG.
- ⁷ Allianz’s commitment to human rights applies to the entire Group, including those entities based in Germany that fall directly under GSCA. The same applies to the Allianz Code of Conduct and Vendor Code of Conduct as well as many other preventive measures (with few exceptions of entities that have defined their own codices and measures). The policy statements of the other Allianz entities directly subject to GSCA are therefore largely congruent with that Allianz SE. There might be differences, for example in the prioritization of risks. The policy statements of these other entities are published on their respective websites.
- ⁸ GSCA covers environmental risks related to mercury, persistent organic pollutants, and the export of toxic waste as well as pollution (of soil, water, air) so severe that it affects human health or livelihoods. See also annex.
- ⁹ Bundesamt für Wirtschaft und Ausfuhrkontrolle (BAFA): „Risiken ermitteln, gewichten und analysieren; Handreichung zur Umsetzung einer Risikoanalyse nach den Vorgaben des Lieferkettensorgfaltspflichtengesetzes“; (BAFA Guideline: Identifying, weighting, and prioritizing risks), August 2022.
- ¹⁰ The likelihood and severity of a risk are analyzed separately using structured questions, resulting in a risk score for each. The combined score places the result into a “heat map” that classifies the risk as “low”, “medium” or “high”. A high risk is one that is highly likely to occur (or recur) and / or has potentially severe or irreversible impacts on people (or the environment).
- ¹¹ Those Allianz entities based in Germany that are themselves directly subject to GSCA have appointed their own Human Rights Officer or made equivalent arrangements for monitoring GSCA-related risk management in the entities that are part of their own business area. The Group Human Rights Officer works closely with the Human Rights Officers of these entities.
- ¹² The Allianz “Sustainability Board” consists of six of the nine members of the Allianz SE Board of Management as well as the functional Group heads for sustainability, people and culture, and communication, for details see Allianz.com [\(Allianz Sustainability Board\)](#).
- ¹³ The assessment of the risk situation in our direct supplier base was based on 2022 data. The composition of our direct supplier base changes little from year to year.
- ¹⁴ Alternatively to accepting the Allianz Vendor Code of Conduct, Allianz suppliers can submit their own Code of Conduct, provided the latter includes equivalent human rights and environmental protections.
- ¹⁵ We expect a net-zero commitment from suppliers with an annual turnover of more than EUR 1.5 million and suppliers with which we have a framework agreement on the basis of which other Allianz entities can conclude project agreements.
- ¹⁶ The Allianz Group Vendor Code of Conduct refers in particular to the Minamata Convention on mercury, the Stockholm Convention on persistent organic pollutants, and the Basel Convention on the export and import of hazardous waste, which are referenced in GSCA.
- ¹⁷ Bundesamt für Wirtschaft und Ausfuhrkontrolle: „Beschwerdeverfahren organisieren, umsetzen und evaluieren; Handreichung Beschwerdeverfahren nach dem Lieferkettensorgfaltspflichtengesetz“; (BAFA Guidelines Organizing, implementing, and evaluating complaints mechanisms; Complaints mechanism according to the Supply Chain Due Diligence Act), October 2022.

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