

**ALLIANZ TECHNOLOGY SE** 

# Modern Slavery Act Statement

June 2025 Classification: Public

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#### Introduction

We are proud to report on our ongoing actions to understand, identify, and address the risk of modern slavery in our operations and supply chains for our 2024 reporting period.

At Allianz Technology Group<sup>1</sup>, part of the Allianz Group, we<sup>2</sup> take a zero-tolerance approach towards human rights violations and we are committed to having ethical and sustainable operations and supply chains. As such, we continually assess the risk of modern slavery, human trafficking or child labor occurring within the scope of its operations and supply chain.

With the German Supply Chain Due Diligence Act (GSCDDA) coming into force in 2023, we have implemented a human rights risk management system within our own operations and our supply chain. Thereby, we have once again increased our efforts to identify, make transparent and mitigate modern slavery.

This statement identifies and assesses the risk of modern slavery in our operations and supply chain, demonstrates the actions we have taken to address those risks, and outlines our forward-looking commitments to minimize those risks in the coming year. Our 2024 Modern Slavery Statement has been prepared in accordance with the mandatory criteria outlined in the Modern Slavery Act 2018 (Cth).

This Modern Slavery Statement is prepared by Allianz Technology SE in compliance with the Australian Modern Slavery Act 2018 (Cth) (the Act). Allianz Technology SE (ARBN 607 145 228) is a reporting entity within the meaning of section 5 of the Act. The statement covers the branches and majority owned subsidiaries of

Allianz Technology SE for the reporting period 1<sup>st</sup> January 2024 to 31<sup>st</sup> December 2024.

This document was approved by the board of Allianz Technology SE in their capacity as the principal governing body of Allianz Technology Group on April 30, 2025.

This statement was signed by Agostino Ferrara and Dr. Turan Sahin in their capacity as CEO and Deputy CEO of Allianz Technology SE.

Agostino Ferrara

CEO Allianz Technology
SE

Dr. Turan Sahin

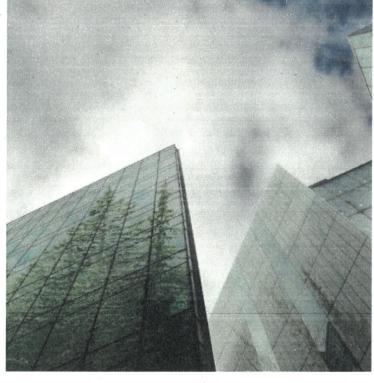
CEO Allianz Services,
Deputy Chairman Allianz
Technology SE

Munich, the

30.04-2025

Munich, the

30.04.2025



<sup>&</sup>lt;sup>2</sup>Throughout the document, "we" stands for Allianz Technology Group.

<sup>&</sup>lt;sup>1</sup> In this Statement, we use "Allianz Technology Group" to refer to Allianz Technology SE, its branches, majority owned subsidiaries, associates and affiliates including Allianz Services and non-IT business of Allianz Technology, as listed in the table in section 1.1 below.

# 1. Structure, operations and supply chain

#### 1.1 Structure

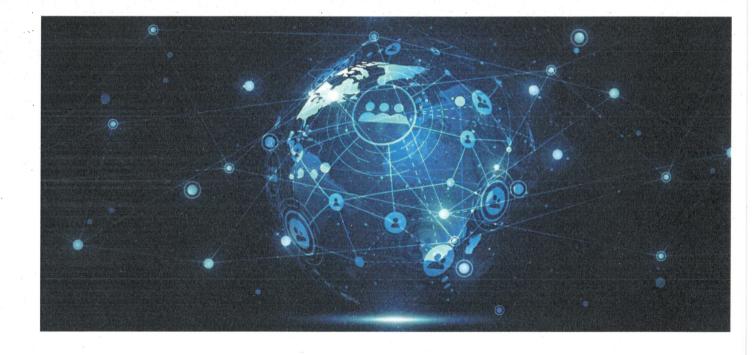
Allianz Technology SE is a European public company with headquarters in Munich, Germany. Allianz Technology SE's Australia Branch was instated as a branch of Allianz Technology SE in 2015 and has the Australian Registered Body Number (ARBN) 607 145 228. In the reporting year 2024 Allianz Technology Group had 20.419,33 full-time equivalent (FTE) employees, including part-time employees Technology business segment: 12.297,83 & Services business segment 8.121,50. Allianz Technology Group has the following legal entities' structure:

Entity	Location	Type of Entity
Allianz Technology SE	Munich, Germany	Headquarters
Allianz Technology SE	Sydney, Australia	Branch
Allianz Technology SE	Brussels, Belgium	Branch
Allianz Technology SE: Magyarországi Fióktelepe	Budapest, Hungary	Branch
Allianz Technology SE	Pune, India	Branch
Allianz Technology SE	Trivandrum, India	Branch
Allianz Technology SE	Dublin, Ireland	Branch
Allianz Technology SE	Rotterdam, Netherlands	Branch
Allianz Technology SE: Munchen Sucursala Bucuresti	Bucharest, Romania	Branch
Allianz Technology SE: Singapore Branch	Singapore, Singapore	Branch
Allianz Technology SE: organizačná zložka	Bratislava, Slovakia	Branch
Allianz Technology SE: Sucursal en España	Barcelona, Spain	Branch
Allianz Technology SE München: Zweigniederlassung Wallisellen	Wallisellen, Switzerland	Branch
Allianz Technology SE	Guildford, UK	Branch
Allianz Technology SE	Casablanca, Morocco	Branch
Allianz Technology SE Sucursal Colombiana	Bogota, Colombia	Branch
Allianz Technology SAS	Paris, France	Subsidiary [100%]
Allianz Services Private Limited	Trivandrum, India	Subsidiary [99,96%]
Allianz Services Mauritius	Mauritius	Subsidiary [100%]
Allianz Technology (Thailand) Co., Ltd.	Bangkok, Thailand	Subsidiary [99%]
Allianz Technology International B.V. <sup>3</sup>	Amsterdam, Netherlands	Subsidiary [100%]
Allianz Technology AG <sup>4</sup>	Wallisellen, Switzerland	Subsidiary [100%]
Syncier GmbH	Munich, Germany	Subsidiary [100%]
Metafinanz-Informationssysteme GmbH	Munich, Germany	Subsidiary [100% Syncier GmbH]
Syncier Consulting GmbH	Vienna, Austria	Subsidiary [100% Syncier GmbH]
Syncier GmbH	Paris, France	Branch [Syncier GmbH]

<sup>&</sup>lt;sup>3</sup> Financial holding company without business.

<sup>&</sup>lt;sup>4</sup> Subsidiary in liquidation

Entity	Location	Type of Entity
Allianz Africa Services SA	Abidjan, Ivory Coast	Subsidiary [100%]
Allianz Technology s.r.o.	Prague, Czech Republic	Subsidiary [60%]
Allianz Technology (Slovakia) s.r.o.	Bratislava, Slovakia	Subsidiary [100%]
Allianz Technology Ltda	Sao Bernardo do Campo (Sao Paulo), Brazil	Subsidiary [100%]
Allianz Technology Sdn. Bhd.	Kuala Lumpur, Malaysia	Subsidiary [100%]
Allianz Services Portugal: Unipessoal LDA	Lisboa, Portugal	Subsidiary [100%]
Allianz Technology GmbH	Vienna, Austria	Affiliate <sup>5</sup> [49,9%]
Allianz Technology GmbH Zweigniederlassung München	Munich, Germany	Branch [Allianz Technology GmbH]
Allianz Technology, S.L.	Barcelona, Spain	Affiliate [49%]
Allianz Technology SpA	Milan, Italy	Associate <sup>6</sup>
Allianz Technology of America, Inc.	Minneapolis, USA	Associate



<sup>&</sup>lt;sup>5</sup> Affiliates are separate legal entities not controlled by Allianz Technology SE but in which Allianz Technology SE owns directly or indirectly shares or holds voting rights unless it is an Associate.

<sup>6</sup> Companies which are not subsidiaries, but which are integrated in the system of governance of Allianz Technology SE, are considered Associates.

#### 1.2 Operations

Allianz Technology Group consists of two business segments (Technology & Services) and acts as the global shared IT service provider for the Allianz Group but also enables a wide range of solutions such as financial business services, actuarial support, professional services, HR services and insurance operations. Its mission is to run, optimize, transform, and innovate infrastructure, applications, and services together with Allianz companies to co-create the best customer experience.

Allianz Technology Group works closely with other Allianz entities to deliver end-to-end solutions and drive digitalization of the Allianz Group. It oversees the full digitalization spectrum – from large IT infrastructure projects that includes data centers, network, and security, to application platforms that span from workplace services to digital interaction. Allianz Technology SE, the parent company with full ownership, is headquartered in Munich, Germany.

The services of Allianz Technology Group are continuously driven by the strategic requirements of Allianz Group, as well as by the operational needs of Allianz Group companies. The Services business segment focuses on enabling Allianz Group to live up to its purpose, by ensuring powerful, standardized services to provide efficiencies, savings, and scalability for the long-term success. Among the vast array of services provided, some are highlighted below:

- Actuarial support provides high technical expertise for actuarial modelling and valuation, risk management, product development, data analytics, reporting and process optimizations.
- Financial Business Services concentrate on business administration, accounting, controlling, pricing, reporting and business analytics.
- Professional services address personal assistance, communications & marketing services, PMO (Project Management Office) & Service Management, audit, compliance and data privacy, Resilience as a service (RaaS), risk management and HR services



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#### 1.3 Supply chain

To operate and provide its services Allianz Technology Group procures goods and services from vendors worldwide. Engaged vendors are mostly established global players with whom we have long-term relationships.

The procured goods and services are categorized and managed in global and local procurement categories:



Global Procurement Category	Local Procurement Category
IT Professional Services	Consulting Services Legal
Insurance <sup>7</sup>	Marketing Print
Professional Services	Human Resources
Business, Financial & Insurance Data	Promotional Items
Marketing	Building & Facility Management
IT Infrastructure	General & Administrative
Travel & Fleet	Logistics
Software	Meetings, Incentives, Conventions, Events (MICE)
Office Equipment	
Energy	

Procurement for Allianz Technology Group is carried out by Global Sourcing and Procurement located in Allianz SE Munich. The procurement function in Allianz Technology SE supports our internal operations, but also has a global mandate to negotiate global frame agreements on behalf of Allianz Technology and Allianz SE. Procurement in Allianz Technology SE branches and subsidiaries apply global frame agreements as well as manage local demand and requirements.

The main external spend at Allianz Technology SE is IT related procurement (IT services, IT infrastructure, and software). For Fiscal Year 2024, the highest spend volumes were on procurement categories directly related to our business model, such as IT Infrastructure, IT Professional Services (incl. Application Programming, Computer Services), and Software

<sup>&</sup>lt;sup>7</sup> Insurance is a category part of Procurement scope, managing 3<sup>rd</sup> party service providers involved in the value chain of claims process. However, it is excluded from the spend overview (see page 7) since claims themselves are not part of Procurement scope and have a separated invoice management process.

Category	Total spend %
IT Professional Services	33.52%
Software	26.70%
IT Infrastructure	25.31%
Professional Services	4.88%
Human Resources	3.21%
Rest <sup>8</sup>	6.38%



#### Source: 2024 Ariba Spend Visibility

\* Reflects all gross procurement costs in Euro assessed based on the payment date.

We continuously update our tools and processes to improve categorization and reflect the current scope.

<sup>\*\*</sup> Others: Netherlands, Spain, Belgium, Romania, Hungary, Poland, Singapore, Slovakia, Mauritius, Thailand, Brazil, and other countries (each <0.1%).



<sup>8</sup> Rest of categories: Building & Facility Management, Business, Financial & Insurance Data, Consulting Services Legal, Energy, Logistics, Marketing, Marketing Print, Office Equipment & Supplies, Travel & Fleet, General & Administrative, MICE, Promotional Items.

#### 2. Risks of modern slavery

Allianz Technology Group seeks to do business with respect for the rights of all its people and those working in any of our supply chains.

In assessing risks of modern slavery, we consider the definition of modern slavery according to the Modern Slavery Act, which incorporates the following:

- · Trafficking in persons
- Slavery
- Servitude
- Forced labor
- Forced marriage
- Debt bondage
- The worst forms of child labor
- Deceptive recruitment for labor or services

The IT professional services industry is not generally regarded as high risk for modern slavery, and Allianz Technology Group therefore considers its exposure to modern slavery in its operations and first tier suppliers as relatively low risk. We do however recognize that higher modern slavery risks are likely to arise in respect of our indirect procurement and deeper in supply chains.

In 2024, we undertook a risk assessment of modern slavery risks in our operations and supply chains to consider the risks that we may be causing, contributing to, or directly linked to modern slavery practices. Our existing assessment was further strengthened by the implementation of a risk management system required by the (GSDDCA) that came into force in 2023 in Germany.

#### 2.1 Risk Assessment

To assess our overall risk profile in relation to our operations and supply chains, we referenced three key factors. These three key factors include:

- 1. The aeographical location: While modern slavery can be found in all countries, some countries are associated with a higher risk for modern slavery, for example, countries with large populations of migrant workers, with weaker labor law enforcement, where charging workers recruitment fees is common practice, or where modern slavery prevalence has been well documented. The risk assessment exercise demonstrated that countries like China, India. Mexico, Brazil, and Thailand could pose a higher modern slavery risk due to the human rights issues in these jurisdictions including forced and bonded labor. child labor, violations of worker rights, human trafficking, enforced disappearances, access to political rights and civil liberties, and issues relating to freedom of association, religion, and the press. However, apart from India, we had limited spend on suppliers operating in/with supply chains in these high-risk countries in 2024. We are also confident from our onboarding process and our annual risk assessment that our exposure to modern slavery risk in India is low.
- Sector/industry: Certain sectors and industries may have high modern slavery risks because of their characteristics, products, and processes. While we consider our exposure to modern slavery in our own operations as being low, the risk assessment exercise demonstrated that we need to pay special attention for our suppliers of IT infrastructure and IT professional services. This is due to our limited visibility over supply chains in respect of IT equipment or IT consultation services provided, and because health, safety, and labor issues related to working hours, working conditions, labor shortages, and occupational safety are major areas of concern in this industry. In addition, companies in this industry operate in a highly competitive environment based on cost and therefore, rely heavily on securing lowcost and contract labor.

- The level of contracted volume/purchaser order amount: To consider the level of exposure to risk and the various business and commercial drivers that may provide leverage to take action to minimize risk.
  - As a result, in the annual supplier risk assessment under the GSCDDA we attributed a risk score to each of the countries where the suppliers are located, obtaining a list of suppliers with either limited, high, or elevated country risk. Similarly, each industry type was characterized as having either low, medium, or high human rights risk. We then narrowed down the spend and the suppliers falling into these categories of identified high risk countries and industries.

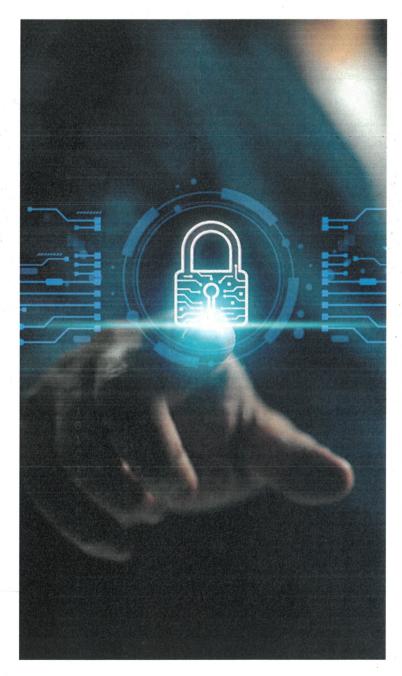
The modern slavery risks that arise within our supply chain beyond our immediate suppliers, concern the procurement of hardware equipment such as computers, laptops, mobile phones, and other IT equipment and IT professional services, for the reasons described above.

#### 2.2 Other risk assessment processes

In 2024 Allianz Technology SE undertook stringent due diligence and supplier qualification processes. As a part of these processes, all vendors signed our standard terms and conditions and their responses were reviewed, validated, and assessed. In addition to the risk assessment described above, these due diligence and verification processes included the following:

- Undertaking due diligence to identify any forced or bonded labor, compulsory work, exploitation and trafficking for direct suppliers.
- Checking whether complaints processes for human rights concerns for direct suppliers are in place.
- Making sure there are health and safety policies in place.
- Ensuring that a whistleblowing mechanism is available for staff and suppliers. This was improved through an update of the complaints procedure in 2023, triggered by the GSDDCA.
- Verifying that minimum wage and fair working hours were covered for direct suppliers.
- Making sure that suppliers' contracts contain modern slavery clauses (if required), which provides Allianz Technology SE with the right to terminate the contract and perform audits on the supplier's premises if the supplier fails to remediate and cease any instances of modern slavery in its supply chain or any part of its business.
- Verifying suppliers respect workers' rights, including freedom of association and rights to collective bargaining, etc.

- Performing annually (and if required additionally ad hoc) a dedicated two step supplier risk assessment in terms of the GSCDDA with focus on Human Rights to identify risks and violations.
- Conducting a human rights risk assessment in the own business area annually and ad hoc. As part of the GSCDDA risk management system, a risk assessment within own operation was implemented in 2023 and also performed 2024. Like the supplier risk assessment, the assessment in the own business area is intended to identify any risks and violations, and areas for improvement.



# 3. Our actions to reduce modern slavery risks

In our annual modern slavery statement, we transparently set out the actions we have taken to assess and address the modern slavery risks that may arise in our operations and supply chains, and critically consider the effectiveness of our efforts.

#### 3.1 Policy commitments

Globally, the Allianz Group is a long-term supporter of principles respecting human rights in business including:

- The United Nations Global Compact
- The Organization for Economic Cooperation and Development (OECD) Guideline for Multinational Enterprises
- The International Bill 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 International Labor Organization Standards
- · The Principles for Responsible Investment; and
- The UN Guiding Principles for Business and Human Rights (UN Guiding Principles)

Guided by its values, Allianz Technology Group plans to continue forging trusted, long-term business relationships and leading the way into an ethical future.

Through our policies we communicate our values and expectations, setting a high bar for ourselves and our partners and making clear that we do not tolerate modern slavery.



We have several policies in place relevant to modern slavery. This includes our Code of Conduct, our Vendor Code of Conduct, our Allianz Sustainable Procurement Charter, our Procurement Standard, our HR Standards, and our Sustainability Integration Framework. To emphasize our commitments to human rights and in response to the GSCDDA, we have published a Policy Statement on the implementation of human rights and environmental due diligence.

Allianz Technology **Code of Conduct** applies to all Allianz Technology employees to guide their actions and decision in an ethical way in their daily business.

Allianz Group **Vendor Code of Conduct (VCoC)** sets minimum standards that Allianz Technology SE expects its vendors (companies that provide goods or services, as well as manufacturers or resellers of such goods or services) to comply with. Acceptance of this Code or proof of an equivalent regime is part of the vendor qualification process in Allianz Technology SE procurement. The VCoC requires vendors to abide by principles for economically, socially, and environmentally sound business practice.

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

Allianz Technology Procurement Standard establishes core principles, responsibilities, and tasks as well as the organizational framework for Procurement within Allianz Technology SE, including its branches and majorityowned affiliates. It ensures that external spend on all goods and services, and engagement with suppliers, is managed in a professional and compliant way.

Allianz Group **HR Standard** applies to all employees of Allianz Group, including Allianz Technology Group employees, and establishes core rules and principles for Human Resources management.

Allianz Sustainability Integration Framework provides further information on integration of the Human Rights approach into core business activities and business organization on Allianz Group level.

The Allianz Technology **Rules of Procedure** for the complaints procedure explain in detail the complaints procedure for those (e.g. employees or suppliers) who wish to make a complaint.

As required by the GSCDDA, the Allianz Technology Policy Statement on human rights lays out the due diligence processes that were implemented for Human Rights risks, the results of the first annual risk assessments in own operations and supply chain, and the expectations that Allianz Technology SE has towards employees and suppliers about human rights.

#### 3.2 Recruitment and employment practices

As an employer, Allianz Technology Group respects international human rights standards for its own workforce.

Our People Function (HR) controls and manages people attraction and sets standards towards recruiting process with controls in place, such as fit and proper checks and background checks. Once employees are onboarded to the company, our Code of Conduct and Allianz Group HR Standard outline rules and principles for Human Resources management and ensures fair employment practices for our employees. It safeguards adherence to local labor laws and commitment to inclusive meritocracy. Our HR policies are implemented in a nondiscriminatory manner, with particular attention to the rights and needs of individuals from potentially vulnerable or marginalized groups or populations that may face heightened risks of modern slavery, and with due regard to the different risks that may be faced by different individuals.

We commit to foster a workplace that is safe, fair and inclusive for every employee. Allianz Technology Group is striving for equal pay, equal work, and work for equal value for all employees regardless of gender, ethnic background, sexuality, family status or other demographic factors. These values are assessed annually and ad hoc through our Human Rights risk assessment. They are also translated into our flexible working set-up. development-oriented programs, employee network for gender equality ("NEO"), an LGBTQ+ inclusion community ("Pride"), a racial, cultural, and ethnic equality network ("GRACE"), a network for disability inclusion ("Beyond"), and the community supporting crossgenerational engagement ("Engage"). Moreover, Allianz Technology SE is conducting an equal pay program to eliminate any unjustified gaps in the short term, especially gender pay gaps, that are later reviewed and certified by an external audit/certification.

Allianz Technology Group effectively responds to disruptions, emergencies and crises that can undermine our employees' wellbeing and safety. The Protection & Resilience team has put procedures and measures in place to safeguard our employees' health and safety, as well as to strengthen organizational resilience.

As laid out in our Policy Statement on human rights, we continuously strive to make Allianz a better place to work with zero tolerance of modern slavery, discrimination, harassment, and unequal treatment where everyone can succeed regardless of age, gender, religion, sexual orientation, or cultural background. Allianz Technology Group recognizes that modern slavery exists on a continuum of violations of human rights and workplace rights, and as such is committed to fostering safety, both physical and psychological, sense of belonging and purpose, equality, and inclusion at the workplace.

#### 3.3 Whistleblowing

Allianz Technology Group encourages its employees to speak-up and report any possible misconduct they believe violates our Code of Conduct, any laws, regulations, order of regulators or any internal rules. The reports and hints can be submitted via our internal whistleblowing channels. As for our external stakeholders and business partners, we encourage them as well to contact us in case of evidence of failure to avoid any human rights violation through our Allianz Grievance Mechanism. 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.

Investigation and mitigation process of incoming reports in Allianz Technology SE is guided by the **Allianz Group Standard for Anti-Financial Crime Compliance.** 

#### 3.4 Modern slavery risk assessment

Understanding our modern slavery risk is critical to prevent and address the modern slavery issue and to better target our actions and partnerships. Allianz Technology SE has therefore a risk management system in place to identify areas of higher risk within the own business area and our supply chain. This process is described at paragraph 2 above.

#### 3.5 Vendor due diligence

In line with Allianz Technology Procurement Standard, our global and local procurement organizations follow standard processes during their entire supplier lifecycle relationship with Allianz. Prior to tendering and/or entering into global frame agreements, suppliers undergo due diligence as part of the pre-qualification process. The vendor due diligence process includes:

- Acceptance of the Allianz Group Vendor Code of Conduct.
- Acknowledgement of the data protection, social, ethical, and environmental principles, as well as compliance norms and rules.
- Integrity screening, sanctions screening and credit checks
- Suppliers with 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.

During supplier engagement and relationship management we perform regular monitoring and

conduct systematic vendor integrity screening on a riskbased approach. In the event of infringement, Allianz Technology Group considers appropriate actions to support achievement of compliance and where compliance cannot be achieved, termination of the contractual relationship.

In local purchasing operations – depending on the spend threshold – suppliers are subject to the above-described due diligence and vendor integrity screening. Spend thresholds vary between branches, reflecting the differing risk profiles of the environments where we operate.

In 2023, Allianz Technology SE has enhanced the due diligence process by implementing the GSCDDA requirements. This includes the implementation of an extended supplier questionnaire that better fulfils the requirements of the GSCDDA.

With these additional questions, the aim is to better assess suppliers' ESG approach and maturity, with a particular focus on modern slavery and fair employment practices. As such, this self-assessment questionnaire is designed to:

- Support the identification of modern slavery risks.
- Foster collaborative efforts with suppliers to address these risks.
- Improve transparency.
- · Identify areas for further due diligence.

This questionnaire has been provided to the group of suppliers identified in our abstract risk assessment, being suppliers operating in a high-risk country or industry, as well as Allianz Technology Group's global and critical suppliers. Consequently, the suppliers identified as potentially high risk within the initial assessment were required to answer this questionnaire, to demonstrate their efforts to protect against modern slavery risks, share insights on their own vendor due diligence processes and provide supporting evidence to their answers.

In 2024, within the GSCDDA Supplier Assessment, we sent out the questionnaire to 53 Allianz Technology Group suppliers and 30 responded. The responses did not identify any modern slavery violations. Suppliers who did not respond were subject to further analysis through critical news monitoring.

Allianz Technology Group is developing and implementing programs, processes, and policies to address modern slavery risks as a business-critical issue, not only because it is the right thing to do but also as it will further improve the integrity and quality of our business operations and supply chains. As a firm, we continue looking into the ways that can minimize modern slavery risks occurring in our supply chain.

## 3.6 Strengthening policy framework – Supplier governance and compliance

#### 3.6.1 Allianz Technology Standard for Procurement

Our Standard outlines the requirement that all contracts with suppliers should contain a modern slavery clause and the obligation to comply with our Vendor Code of Conduct (or equivalent standards).

The Standard has been fully implemented, is part of our procurement processes and outlines the contracts we have with all suppliers.

#### 3.6.2 Vendor Code of Conduct (VCoC)

Adherence to the standards contained in the VCoC is one of the evaluation criteria in the Allianz supplier qualification and selection process undertaken by the Global Sourcing & Procurement. The VCoC is also integrated as a mandatory part of the onboarding/screening process.

Allianz Technology SE has also developed an **exception handling process** for vendors who request to use their own Codes of Conduct. In these cases, a specific check list is implemented to review supplier's codes of conduct to ensure full alignment with the Allianz VCoC.

3.6.3 Introducing contractual obligations upon our suppliers and vendors: our contractual safeguards

The obligations set out in our VCoC are strengthened by our standard supplier terms and anti-slavery clauses, which have been incorporated into new or renewed agreements with medium and high-risk suppliers.

These clauses require suppliers and their employees to contractually commit not to engage in slavery or human trafficking and to conduct due diligence on their own supply chains.

These clauses provide our organization with the right to terminate agreements by written notice to a supplier with immediate effect if the supplier commits a material breach which is irremediable or, if such breach is remediable, fails to remedy that breach within a period of 30 days after being notified to do so. Being in breach of any applicable law (including the Australia Modern Slavery Act) would amount to a material breach of our supplier terms.

As modern slavery clauses are key to articulating human rights expectations in commercial contracts, we drafted these clauses to be fully aligned with our commitment to combat modern slavery in our supply chains, and in line with the values and principles contained in the UN Guiding Principles on Business and Human Rights.

As a result, all new contractual engagements with vendors and renewals of the existing contracts have to be negotiated based on the new templates and must include modern slavery clauses.

In 2023, the Allianz Supply Chain Clause has been revised and updated to reflect the GSCDDA and to oblige Allianz' Vendors to comply with the requirements of the GSCDDA.

## 3.7 Capability building and awareness creation

Our Policy framework includes guidance on recognizing modern slavery and how to report concerns, as well as giving wider guidance on how our people can help ensure that vulnerable individuals are protected from harm or abuse.

A web-based learning module including information on modern slavery issues and how they can materialize is integrated into our compliance training plan as part of annual compliance trainings for all our Australian-based employees. Additionally, in December 2024 we launched the Allianz Global - Human Rights and Employee Rights Training for all employees, to create awareness and understanding of human rights across the organization. In the light of the GSCDDA, there were additional trainings provided for those assessing the human rights risks within the own business area and the supply chain. In these trainings, awareness for human right risks, including modern slavery and how this could look like, was built.



## 4. Action plan for next reporting period

Allianz Technology Group is continuously taking steps to ensure that slavery and human trafficking, including child and forced labor are not taking place in our operations or in our supply chain activities.

With the GSCDDA implementation which started in 2023, we will take the following actions to improve our human rights risk management processes and thereby detect, mitigate and prevent modern slavery:

#### Facilitation of the risk assessment:

In 2025, we will focus on improving the training of the GSCDDA risk experts and risk managers to further improve assessment quality, and enable locations to implement further concrete, time-bound preventive measures.

#### Whistleblowing & Complaints management system:

Our complaints management system is continuously improved and shall be further enhanced to meet the demands of potential complainants.

#### Training/Skills:

We shall continue and adapt our existing trainings, especially with respect to the GSCDDA

In 2024, Allianz Group has launched an internal human rights trainings module, also available to all Allianz Technology Group employees to raise awareness on the importance of human rights. We will continue to actively promote the training amongst our employees, in addition to the already existing training modules on modern slavery.



## 5. Assessment of effectiveness of actions taken

In view of the German GSCDDA, the new function of the Human Rights Officer was implemented in 2023. This function aims to monitor the effectiveness of the risk management system on a yearly basis. In the last year, the monitoring yielded no findings, but minor processual areas of improvement.

Furthermore, with the integration of modern slavery risks into Allianz Technology Integrated Risk & Control System (IRCS) framework, Allianz Technology Group aims to ensure that effective controls or other risk mitigation activities are in place for all significant operational modern slavery risks.

Also, when introducing anti-slavery clauses into agreements with vendors, we strived to make every new or renewed contractual engagement at Allianz Technology SE compliant with our requirements. We ensured that all our suppliers have accepted the VCoC as a mandatory requirement.

Additionally, we collect feedback from our employees on our working environment and culture via the Allianz Engagement Survey (AES) on a yearly basis to identify gaps or areas of improvement. It includes three main indexes: inclusive meritocracy; employee engagement; and work well index. Once survey results are available, follow-up sessions are initiated within teams across organization to jointly come up with improvement actions and ways of implementing them.

Whenever there are gaps in the process identified (e.g., by the Compliance team), we assess and close them.

Allianz Technology Group will continue to consider how it can improve measuring the effectiveness of its modern slavery risk management processes.

## Consultation with other controlled entities

Allianz Technology SE conducted consultations with its entities (branches and subsidiaries as shown in the section 1.1) with the focus of increasing their awareness of actions needed to identify, assess, and address modern slavery risks.

We ensure that the Allianz Technology SE Board is briefed, so they are aware of their accountabilities and informed of:

- Work under way to assess the potential of being exposed to modern slavery risk in our value chain,
- Plans and progress related to modern slavery risk management, and
- Key actions being undertaken to understand and manage modern slavery risk relevant to our activities.

All Allianz Technology SE branches and subsidiaries follow the policies and processes mentioned in sections [3.1], which are applicable to the various functions of these branches and subsidiaries. Allianz Technology SE Headquarters in Munich, Germany coordinates meaningful and ongoing dialog with the entities worldwide.



#### **Statement Annexure**

#### Mandatory criteria

This statement complies with the mandatory criteria for a modern slavery statement outlined in section 16 of the *Modern Slavery Act 2018* (Cth). The below table indicates where each requirement is addressed in this statement.

Requirement		Page Number
a	Identify the reporting entity.	Page 3
b	Describe the structure, operations and supply chains of the reporting entity.	Pages 4 – 7
C	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Pages 8 – 9
d	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Pages 9.– 12
e	Describe how the reporting entity assesses the effectiveness of such actions.	Page 14
f	Describe the process of consultation on the development of the statement with any entities that the reporting entity owns or controls (if a joint statement has been made under section 14, also describe the process of consultation with the entity giving the statement).	Page 14
g	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Page 13



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