

**ALLIANZ HOLDINGS PLC GROUP  
MODERN SLAVERY STATEMENT  
2021**

# Allianz Holdings PLC Group Modern Slavery Statement

For the year ended 31 December 2021

## Introduction

Modern slavery is a violation of someone's fundamental human rights and is against the law. Allianz UK has a zero-tolerance approach to any breach of the Modern Slavery Act 2015 ("the Act"), and we are strongly committed to having an ethical and sustainable supply chain. We fully support the Act, which aims to put an end to all types of modern slavery in the UK. In particular, section 54 of the Act focuses on making sure slavery and human trafficking doesn't take place in businesses and supply chains.

When we talk about "Allianz UK" in this Statement, we mean the Allianz Holdings plc Group of companies which includes, for the purposes of section 54 of the Modern Slavery Act 2015:

- Allianz (UK) Limited
- Allianz Engineering Inspection Services Limited
- Allianz Holdings plc
- Allianz Insurance plc
- Allianz Management Services Limited
- Fairmead Insurance Limited
- Highway Insurance Company Limited
- Liverpool Victoria General Insurance Group Limited
- Liverpool Victoria Insurance Company Limited
- LV Repair Services Limited

"We secure your future" is our purpose at Allianz, and we use this as a foundation for all our activity when engaging with suppliers and throughout our supply chains. We're committed to transparency in all our business dealings and have the same high expectations of all those with whom and for we conduct business.

## Preventing modern slavery at Allianz UK

The nature of the financial services industry limits the direct exposure of most forms of slavery, human trafficking or child labour, as the tasks carried out require regular training and often regulatory licences or specific certifications. To our knowledge, there have been no incidents of modern slavery (as outlined by the Act) within Allianz UK or by any of our suppliers or supply chains.

In line with the Act, the Allianz UK Procurement departments have developed a range of activities to reduce the risk of modern slavery in our supply chains. These include identification,

risk and other prevention processes, which depend on the level of risk that comes with the service the supplier provides.

Procurement due diligence is carried out on all on-boarded suppliers and renewed via the Procurement department tools, both before the start of the relationship and throughout the engagement.

Here's how we work to detect and prevent modern slavery at Allianz UK:

### **Signing up a new supplier and ongoing due diligence**

When we want to start working with a new supplier, our processes request the execution of several checks beforehand. We ask them to confirm that they have the right processes, investigations and compliance systems in place, and we ask whether suppliers have a modern slavery policy in place and verify the response.

We perform sanctions conduct searches to ensure there have been no reported violations against the Act.

We also complete other assessments, such as segmentation and screening activities. This screening helps us identify risks relating to corruption, bribery, sanctions and other forms of non-compliance. These checks allow us to establish the level of risk associated with working with that supplier, and how to reduce it.

We've strengthened our mandatory RFP (tender) question set, increasing the focus on environmental, social and governance (ESG) topics, further ensuring selected suppliers display strong commitment to ethical business conduct.

### **Our contractual safeguards**

Our standard Terms and Conditions for the Procurement of Goods and Services include our commitment to protecting human rights – including prevention of modern slavery.

The clause calls on our Suppliers to promote protection of human rights, both internally and across their supply chains. They need to do this through their actions and by complying with the laws of the countries in which they operate.

This covers all inhumane or discriminatory behaviour, including:

- child, forced or involuntary labour
- human trafficking
- Inhumane or discriminatory treatment
- Protecting workers' rights to freedom of association (the rights of a person to join with other people, for example, as a union, to defend their rights) and
- Enabling collective bargaining (where employees can talk as a group with their employers to agree things like pay and working conditions).

If a Supplier ever breaches this clause, we have the right to immediately terminate their contract with us.

### **Training and testing our staff**

Throughout 2021, employees within the Allianz UK Procurement Departments continued to update their training, skills and awareness. We've created a mandatory ESG Learning Pathway on our internal training system, which focuses specifically on procurement activities and how, and why, we should conduct them. This training and certification remains core to our standard training programme within the AMS Procurement function.

We continue to look at new ways of training and testing our staff in this area to ensure we are up to date and aware as new potential risks develop in and around our supply chains and in the wider Procurement related business environment. This will ensure that our procurement employees understand the latest ways to detect, identify and prevent human rights violations in the supply chain.

But we don't just need to focus on the risk of slavery in our supply chain – we also need to make sure we address the potential risks within Allianz. With this in mind, we make sure all Allianz UK employees take part in regulatory testing when they join us, and annually after that. We've changed the way in which we undertake the regulatory tests, moving from once a year to spreading out the various tests on monthly intervals throughout the year. The testing incorporates the Allianz Group Code of Conduct, which includes the UN Global Compact's Ten Principles. This is a framework of ten principles for human rights, labour, the environment and anti-corruption.

### **Our Modern Slavery Standard**

Allianz UK's Modern Slavery Standard is reviewed annually. It explains what our employees need to do and who to talk to if they spot or suspect modern slavery in our business or in our supply chains. It covers what is expected of our supply chain and also what could happen if an employee doesn't follow the standard. It applies to everyone in our organisation, and is available on our corporate intranet.

### **The CIPS Corporate Ethics Mark**

Allianz's commitment to ethical supplier sourcing and supplier management principals is evidenced through our achievement of the CIPS Corporate Ethics Mark. Obtaining this Mark requires any colleague who spends the majority of their working time on supplier-facing activities to individually complete the CIPS ethics certification, for the Allianz Holdings CEO to sign a Statement of Commitment to ethical sourcing and Supplier management, and for the company to take a proactive approach in preventing unethical behaviour.

During 2021, we quadrupled the number of colleagues required to undertake the CIPS ethics exam, extending it beyond Allianz procurement personnel and now including our colleagues

within LV=, increasing our knowledge of how to conduct and promote ethical business practices significantly. This has resulted in the impressive retention of the CIPS Corporate Ethics Mark.

### **Allianz UK quality assurance**

We've increased our own quality assurance systems to help us detect and prevent modern slavery. These include internal auditing and due diligence checks on suppliers. They cover the internal controls we need to make sure suppliers set up and maintain the processes necessary to prevent slavery in their organisation and supply chain.

### **Looking for new ways to improve**

We're always looking for new ways to protect against modern slavery in our supply chain. As well as expanding our training programme for ethical procurement and internal advertising campaign of the Modern Slavery Standard, we've also introduced new systems to enhance our visibility of supplier compliance to Allianz's standards. We've increased our ability to carry out more robust professional procurement scrutiny of suppliers and their activities, and gain more assurance for Allianz on the behaviours within our supply chain.

We've confirmed our whistle blowing reporting platform is available to all external Parties, as well as internally advertising that of the FCA ([whistle@fca.org.uk](mailto:whistle@fca.org.uk)). The numbers for the Allianz Confidential reporting lines, available 24/7, are as follows:

- Allianz (UK) 0800 0284624
- ACIS (India) 0471 2700110 or 0471 2700220

We continue to review our processes and training to make sure we're doing everything we can to detect, prevent and promote protection against modern slavery across Allianz UK and our supply chains, and will reinforce any developments by updating our Allianz UK Procurement Standard, which acts as the standard for supplier engagement across the organisation.

Approved by the Boards of Allianz (UK) Limited, Allianz Holdings plc, Allianz Insurance plc, Allianz Management Services Limited, Allianz Engineering Inspection Services Limited, Fairmead Insurance Limited, Highway Insurance Company Limited, Liverpool Victoria General Insurance Group Limited, Liverpool Victoria Insurance Company Limited, and LV Repair Services Limited on 20 May 2022 and signed on their behalf by:



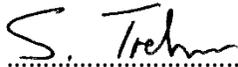
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