# ALLIANZ HOLDINGS PLC GROUP MODERN SLAVERY STATEMENT 2024

# Allianz Holdings PLC Group Modern Slavery Statement

## For the year ended 31 December 2024

### Introduction

Modern slavery is a violation of someone's fundamental human rights and is against the law. Allianz UK have 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.

This statement is made in accordance with section 54 (1) of the UK's Modern Slavery Act 2015 and outlines the steps we have taken to identify, assess, address and combat the risk of Modern slavery and this applies to Allianz and its subsidiaries which include:

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

Allianz Group are a leading integrated financial services provider offering a wide range of products, services and solutions in insurance and asset management. We have 128 million customers in 70 countries. "We secure your future" is our purpose at Allianz UK, and this is used as a foundation for all our activities within the business, as well as within our engagement with suppliers and throughout our supply chains. Allianz's approach to modern slavery is part of the Group's overall commitment to human rights and human rights due diligence processes for our own operations and supply chains. Allianz act in a responsible, sustainable and inclusive manner. We are committed to maintaining strong and robust policies and procedures that ensure modern slavery and human trafficking is prevented, this also ensures transparency in all our business dealings and we expect all

our suppliers to hold the same standards and governance within their activities, enabling a consistent approach.

### **Our Commitment to Human Rights**

At Allianz, we are committed to upholding human rights and ensuring that neither our operations nor our supply chains are complicit in human rights abuses. This commitment aligns with the German Supply Chain Due Diligence Act, which mandates comprehensive due diligence to prevent negative human rights impacts, including prohibitions on child labor, forced labor, and slavery. Our Human Rights Officer oversees UK operations, ensuring compliance with these obligations and the German Supply Chain Act.

### Risk Assessment Preventing Modern Slavery at Allianz UK

Allianz UK are committed to eliminating all forms of modern slavery within the business and within our supply chain. This is evidenced by the due diligence completed within our onboarding of suppliers and contractors, along with continuous monitoring and review throughout the relationship to ensure Allianz's standards are adhered to. Allianz UK are also committed to ensuring there is no modern slavery or poor working conditions within their workforce. We work collaboratively with our recognised trade unions, Unite and our employee consultative forum, to ensure fair working conditions and respect local labour laws.

Allianz had no record of modern slavery (as outlined by the Act) within Allianz UK or with our suppliers or supply chains in 2024. In addition, no substantive risks relating child labor, the worst forms of child labor, forced labor or slavery were identified in any Allianz entity in 2024.

The risk of modern slavery occurring in the own operations of an insurance and asset management companies was a priori assessed to be "low" due to the nature of the industry and the type of services being procured. However, it is incumbent on the business to ensure it is doing whatever is possible to mitigate the risk.

In line with the Modern Slavery Act, Allianz UK carry out due diligence and regular monitoring to reduce the risk of modern slavery within our supply chains. This includes identification of high risk factors within the supply chain and any other areas of concern. Where identified, appropriate steps are taken for the management of the risks. Prevention processes are put in place for the ongoing monitoring of risks and compliance to the requirements to eliminate modern slavery within our operations and the operations of our supply chain.

Due diligence and risk assessments are carried out on all suppliers when they are onboarded and are reviewed annually thereafter.

Allianz UK prevent Modern Slavery through the following procedures:

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

When onboarding a new supplier, Allianz have a clear structure and process in place to undertake compliance checks which ensure we are using reputable organisations that adhere to Allianz's zero-tolerance to any form of Modern Slavery.

Due diligence is undertaken through a structure of procedures within Allianz's vetting process. This includes identification of any legal, regulatory or sanction actions, review of media coverage for all suppliers along with more in-depth investigation for our high-risk suppliers.

Our mandatory RFP (tender) question set focuses on environmental, social and governance (ESG) topics, ensuring selected suppliers display strong commitment to ethical business conduct, shielding our stakeholders from ESG investment risks.

Allianz has in place a risk-based onboarding approach for suppliers whereby the nature of the work to be undertaken by the supplier is assessed longside the geographical location from which supplier services will be conducted and their use of sub-contractors i. A dedicated integrity screening process is applied to suppliers, to identify potential non-compliance with various international standards, including those for the prevention of modern slavery, human trafficking, child and forced labour. Within the vendor integrity screening process, vendors must confirm compliance to Allianz's principles, rules and expectations on integrity as set out in our Vendor Code of Conduct which includes fair working practices and non-acceptance of any practices associated with modern slavery.

### 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 conditions of the agreement calls on our suppliers to promote protection of human rights, both internally and externally 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 on pay and working conditions).

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

### **Due Diligence in Corporate Insurance and Investment Management**

As a corporate insurer and investor, our human rights due diligence process forms part of our overall sustainability approach, which is integrated into our broader risk management system. We use a combination of sector specific approaches to identify human rights risks. Human rights-related due diligence has been integrated into our underwriting guidelines and processes where relevant, to ensure that human rights are part of the overall risk assessment for insurance and investments in non-listed asset classes.

### Training and testing our staff

All new and existing Allianz employees undertake mandatory training which includes training on the Allianz Group Code of Conduct. Topics within this training include :

- Respect for Human Rights
- Acting with Integrity
- Managing conflicts of interest
- Free and fair competition
- Preventing Financial Crime
- Adhering to Economic sanctions
- Holding Business Partners to our standards
- Cooperation with Regulators
- Corporate Responsibility/Sustainability

Adherence to the standards set out within the Code of Conduct ensure that there are no practices within Allianz UK or our supply chain that could lead to unfair working conditions. Through sufficient training and careful procedures in place, Allianz UK have a clear framework in preventing Modern Slavery and mitigating risks, thus 'securing Allianz's future'. This is reviewed periodically and updated to take into account new and changing impacts, risks and regulations.

### Our Modern Slavery Statement and Code of Conduct

Allianz UK's Modern Slavery Statement and the Code of Conduct provides guidelines for employees to understand and adhere to. It explains the procedures that should be followed, expectations of all staff and the repercussions if requirements are not being followed. The documents are accessible on the 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 colleagues working within supplier-facing activities to individually complete the CIPS ethics certification, which includes training on ethical business practices. This enables the Allianz Chief Procurement Officer to sign a Statement of Commitment to Ethical Sourcing and Supplier Management, and for Allianz to take a proactive approach in preventing unethical behaviour.

### **Allianz UK Quality Assurance**

Allianz UK have enhanced their quality assurance systems to help better detect and prevent Modern Slavery. This includes internal auditing and due diligence checks on suppliers.

### 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 whistleblowing reporting platform is available to all external Parties, as well as internally advertising that of the FCA and the PRA. The number for the Allianz Confidential reporting line, available 24/7, is as follows:

### Allianz (UK) 0800 0284624

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.

Key performance indicators relating to due diligence screening processes, ongoing supplier monitoring and completion of staff training are being rolled out to ensure compliance to requirements within the statement can be tracked.

This statement was approved in 2025 by the Boards of Allianz (UK) Limited, Allianz Holdings plc, Allianz Insurance plc, Allianz Management Services Limited, Allianz Engineering Inspection Services Limited, Highway Insurance Company Limited, Liverpool

Victoria General Insurance Group Limited, Liverpool Victoria Insurance Company Limited, and LV Repair Services Limited and signed on their behalf by:

Colm Holmes

Director for:

Allianz (UK) Limited

Allianz Holdings plc

Allianz Insurance plc

Allianz Management Services Limited

Highway Insurance Company Limited

Liverpool Victoria General Insurance Group Limited

Liverpool Victoria Insurance Company Limited

Graham Gibson

Director for:

Allianz Engineering Inspection Services Limited

Serge Raffard

Director for:

LV Repair Services Limited