



# WHISTLEBLOWER POLICY

NOVEMBER 2024

CLASSIFICATION: PUBLIC



# CONTENTS

1. PURPOSE
2. PRINCIPLES
3. EXCLUSIONS
4. MAKING A DISCLOSURE
5. PROTECTION AS A WHISTLEBLOWER
6. YOUR OBLIGATIONS AS A WHISTLEBLOWER
7. HOW WILL MY CONCERN BE INVESTIGATED
8. ROLES AND RESPONSIBILITIES
9. GOVERNANCE AND MONITORING
10. KEY TERMS
11. DEFINITIONS AND ABBREVIATIONS
12. RELEVANT LEGISLATION AND CORPORATE RULE INFORMATION

# 1. Purpose

Allianz Australia's Whistleblower Policy (the Policy) outlines how you can freely, without fear of reprisal, raise concerns about any form of misconduct or unethical behaviour as defined in this Policy.

At Allianz Australia, we are committed to the highest standard of conduct and ethical behaviour. Our Code of Conduct guides our employees (our People) in the way they behave and the actions they take. Our People have a professional responsibility to speak up and report unethical behaviour and Allianz Australia is committed to providing a safe environment in which our People can do so.

This Policy ensures you know who to contact, how to make a report, how the investigation will be managed and the protections available to you. This Policy outlines how Allianz Australia meets its obligations in relation to Whistleblower protection.

Anyone with information about Reportable Conduct is encouraged to report that information under this Policy. This includes all current and former: employees, directors, officers, contractors and suppliers of any Allianz Australia company (including employees of suppliers or contractors)

and associates, as well as spouse and relatives or dependents of any of these people (each, an Eligible Person).

All Eligible Persons are eligible for protection under this Policy.

This policy applies to Allianz Australia Limited and its subsidiaries (Allianz Australia or "the Company").



## 2. Principles



### Speak up and Report

Allianz encourages its employees and all other Eligible Persons to speak up and report known or suspected incidences of fraud, corruption, theft, dishonest behaviour, misconduct and criminal activity. Similarly, Allianz encourages its employees to speak up about any concerns relating to unethical conduct, bullying and harassment and any other improper conduct. Speaking up enables Allianz to live up to the zero-tolerance principle for behaviour which is not in line with our Code of Conduct and People Attributes.



### Allianz's Expectation of its People

Allianz maintains the highest standards of ethical behaviour and integrity and expects all employees to act honestly and ethically, and to make a report on reasonable grounds.



### Identity Protection and Confidentiality

Allianz will maintain full confidentiality of the identity of any Eligible Person who chooses to report a matter under this Policy. Your identity will only be disclosed if you give your consent to Allianz to disclose that information or in exceptional circumstances where the disclosure is authorised or required by law. You can make an anonymous report if you do not want to reveal your identity. However, we encourage you to provide your name or way to communicate with you because it will make it easier to investigate and address your report.



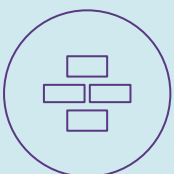
### Investigations

All investigations will be conducted professionally and impartially, in a timely manner and by appropriately skilled and experienced personnel. Where reasonable, we will update you on the status and outcomes of your disclosure but this will not always be possible or may not be appropriate depending on the circumstances. Allianz will conduct the investigation in accordance with relevant laws and internal policies.



### Allianz's commitment to Whistleblower protection

Allianz will not tolerate detrimental conduct against Whistleblowers. The Company will look to protect the identity of people who make a report. Your identity (and any information Allianz has because of your report that someone could likely use to identify you) will only be disclosed if you give your consent to Allianz to disclose that information or in exceptional circumstances where the disclosure is allowed or required by law.



### Governance

This Policy is designed to comply with Allianz's legal obligations including appropriate procedures that are in place for protecting Whistleblowers. This Policy provides the appropriate structure around investigation of disclosed matters, reporting, and the appointment of the Whistleblower Protection Officer.



### 3. Exclusions

While Allianz welcomes all concerns to be raised freely and without fear of reprisal, not all concerns raised are covered by this policy. Some of these exclusions are listed below.

#### Work Related Grievances\*

- Disclosures relating to personal, work-related grievances. Work Related Grievances are grievances relating to your employment that have implications for you personally (such as a disagreement between you and another employee or a decision about your promotion). These are generally not Reportable Conduct and fall outside the scope of this Policy.
- Personal work related grievances should be reported to People and Culture in the first instance in accordance with the Procedure for Reporting Fraud, Corruption and Other Serious Misconduct Allegations.

#### Customer Complaints

- Customer complaints are generally excluded from the definition of Reportable Conduct. If you are a customer and are dissatisfied with the way Allianz has dealt with a particular matter, product, service, including an existing complaint, please contact us with your concerns via phone, email or online.

\* Legal protection for disclosures about solely personal employment related matters are only available under the law in limited circumstances. A disclosure of a personal work-related grievance will remain protected if, in summary:

- it concerns detriment to you because you have or may be considering making a report; or
- it is made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the law about Whistleblowers.

Under the law, a grievance is not a 'personal work-related grievance' if it:

- has significant implications for an entity regulated under the law that do not relate to the discloser;
- concerns conduct, or alleged conduct, in contravention of specified corporate and financial services laws, or that constitutes an offence punishable by 12 months or more imprisonment under any other Commonwealth laws;
- concerns conduct that represents a danger to the public or financial system; or
- concerns conduct prescribed by the regulations.

## 4. Making a disclosure

### When can I make a report?



Before you make a disclosure you should satisfy yourself that you have reasonable grounds for doing so. You do not need to prove your allegations; a disclosure can still qualify for protection even if the disclosure turns out to be not substantiated. However, you must not make a report that you know is not true or is misleading. We encourage everyone to speak up and report a concern as soon as possible.

### Who can a report be made to?

You can report to our **Whistleblower Protection Officer (WPO):**

Valerie Loi, General Manager Risk Management  
Email: [Valerie.Loi@allianz.com.au](mailto:Valerie.Loi@allianz.com.au)  
Phone: 0435 084 868

Alternatively, you can report to one of our Allianz Whistleblower Reporting services:

#### Phone

#### KPMG FairCall

1800 059 798 (AUS) or  
0800 000 594 (NZ)

#### Postal Mail

The FairCall Manager  
KPMG Forensic  
PO Box H67  
Australia Square  
Sydney NSW 1213

#### Online Submissions

#### BKMS

<https://www.bkms-system.com/Allianz>



When using the [BKMS Online Form](#), to ensure you receive Whistleblower protection under Australian law, please select “Compliance Function of Legal Entity/Branch as chosen above” to direct your communication to the WPO.

If you would like the Allianz SE Investigations Team based in Munich to investigate your matter, you can select that option “Compliance Function of Allianz SE Headquarters of Allianz Group” on the form.

It is also possible to make your report to any of these additional Eligible Recipients:

- Chief Audit Executive
- External Auditor
- Chief Actuary

- Company Secretary
- Any of our Chief General Managers
- Managing Director
- Any one of the Allianz Australia Board of Directors.

However, we do encourage you to report to our WPO or one of our Whistleblower Reporting Services outlined above.

### Reporting Anonymously

You can choose to make your disclosure anonymously. If you report to any of the Eligible Recipients noted above, including the WPO, your disclosure can be made anonymously. However, you may find it easier to do so by using the independent Allianz Whistleblower Service: KPMG FairCall or the BKMS online submission service. You will still be protected under the Whistleblower Laws.



When making an anonymous report using one of our Allianz Whistleblower Services, we ask that you provide as much information as possible for the reason that exercising your right to anonymity may practically make it more difficult for us to investigate the issue or limit actions we may be able to take. When you use an Allianz Whistleblower Service, you will be assigned a unique identification number. The call management system will not record your identity or the originating phone number, unless you wish to disclose it.

### Protection as a Whistleblower

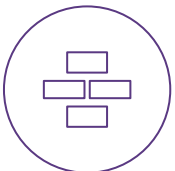
A report must be made directly to an Eligible Recipient to qualify for protections under the Whistleblower laws and this Policy. Further details on protections afforded to Whistleblowers are set out in Section 5 Protection as a Whistleblower.



The role of the WPO is to protect you as a Whistleblower. Where an allegation is made against the WPO, the Chief People and Culture Officer will be appointed as the WPO.

### Further information

You can seek confidential information on the operation of this Policy and how a disclosure will be handled, without making a disclosure, by contacting the WPO or our Head of Fraud Risk and Financial Crime. However, if you require legal advice with respect to your obligations under this Policy or the Whistleblower Laws, then we recommend you contact an independent legal practitioner.



Disclosures to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the Whistleblower provisions in the Corporations Act are protected (even in the event that the legal practitioner concludes that a disclosure does not relate to Reportable Conduct).

# 5. Protection as a Whistleblower

You will be eligible for protection as a Whistleblower under the law if:

- You make a report of Reportable Conduct directly to an Eligible Recipient of the Company listed above, ASIC, APRA or another Commonwealth body prescribed by regulation;
- you have made a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the Whistleblower provisions; or
- you have made an 'emergency disclosure' or 'public interest disclosure'; or
- you make a report of Reportable Conduct in relation to tax to an Eligible Recipient or to an auditor, or a member of an audit team conducting an audit, of the Company or a related body corporate, a registered tax agent or BAS agent who provides tax services or BAS services to the Company or related body corporate, an employee or officer of the Company or related body corporate who has functions or duties that relate to the tax affairs of the Company or related body corporate, or the Commissioner of Taxation,

These protections include:

- Identity protection;
- Protection from detriment;
- Compensation and remedies; and
- Civil, criminal and administrative liability protection.

The law protects certain disclosures made in "emergency" and "public interest" situations, in which case disclosures can be made to additional recipients following a special process under the law (including members of parliament and professional journalists).

Disclosures that are not about Reportable Conduct do not qualify for protection under the Corporations Act (or the Taxation Administration Act, where relevant).

Please contact the Allianz Australia Company Secretary if you would like more information about emergency and public interest disclosures.

## I. IDENTITY PROTECTION

Where you make a disclosure, your identity (or any information which could identify you) will be held in the strictest confidence and will only be shared where:

- you have been consulted and consented to the disclosure; or
- the WPO is allowed or required by law to do so.

However, you should be aware that in certain circumstances the WPO won't need your consent to share your disclosure if:

- the information does not include your identity;



- we have taken all reasonable steps to reduce the risk that you will be identified from the information; and
- it is reasonably necessary for investigating the issues raised in your disclosure.

We will take reasonable measures to protect your identity and any information within a disclosure likely to identify you, which may include but is not limited to:

- Limiting access to individuals directly involved in managing and investigating the disclosure;
- Securely storing any materials relating to the disclosure;
- Providing training and awareness about the confidentiality requirements and consequences of breaching confidentiality to individuals handling and investigating disclosures.

Information coming into the possession of a person from a Whistleblower, including the identity or any information that may lead to the identification of a Whistleblower, must not be disclosed other than as set out above. A breach of this section is considered to be a serious matter and may result in disciplinary and/or legal proceedings relating to the actions of the unauthorised disclosure by an individual and/or organisation under certain applicable legislation.

## II. ALLIANZ'S COMMITMENT TO YOUR PROTECTION AS A WHISTLEBLOWER

Allianz Australia does not tolerate retaliation against Whistleblowers, we are committed to taking all reasonable steps to protect you from detrimental conduct as a result of making a report under this Policy and the Whistleblower laws.

**Protections** may include the following:

- monitoring and managing the behaviour of other employees;
- relocating employees (which may include the people alleged to have been involved in the Reportable Conduct) to a different division, group or office;
- offering you a leave of absence or flexible workplace arrangements while a matter is investigated;
- access to support from the Company (such as counselling or other support services); and/or
- rectifying any detriment that you have suffered.

You should tell the WPO if you or someone else, is being, or has been subject to detrimental conduct. Allianz Australia will treat this very seriously.

Examples of **detrimental conduct** can include but are not limited to:

- Dismissal, alteration of duties or demotion of an employee;
- Any form of harassment, threat, bullying or intimidation of the Whistleblower;
- Discrimination;
- Damage to a person's reputation; and
- Negatively managing Whistleblower performance that is not reflective of actual effort.

An employee, contractor, director or Business Partner who is an Eligible Person will not be protected from dismissal, demotion or other disciplinary action if there are other valid reasons to dismiss, demote or take disciplinary action against them. Any person involved in detrimental conduct will be subject to disciplinary action. In some circumstances, this may also be a criminal offence punishable by imprisonment.

If you believe you have experienced or are suffering detriment, you should report this to the WPO directly or via one of our other available reporting channels.

## 6. Your obligations as a Whistleblower

### FALSE OR MISLEADING DISCLOSURES

- When making a disclosure, you must have reasonable grounds to suspect the information you are disclosing concerns misconduct or an improper state of affairs or circumstances in relation to Allianz Australia or its related bodies corporate, or other Reportable Conduct (such as breach of certain Commonwealth laws). This does not mean you need hard evidence – you will not be subject to penalty if the information turns out to be incorrect.
- As an Allianz Australia employee, engaging in knowingly false reporting is considered a serious matter and may result in disciplinary proceedings up to and including dismissal.

## 7. How will my concern be investigated?

Upon notification of Reportable Conduct disclosure, the Investigation Officer will perform a preliminary assessment of the disclosed matter and obtain sufficient facts to determine if there is a reasonable cause to believe the alleged activity, or any other related activity, has been committed, attempted or is occurring.

The Whistleblower Protection Officer in consultation with the Investigations Officer will recommend or decide if the matter should be investigated or reported to another area for investigation. The reasoning behind this decision will be formally documented and recorded in Allianz ORGS system and communicated to the Whistleblower by the Whistleblower Protection Officer, where appropriate.

All investigations will be conducted in a timely manner by appropriately skilled and experienced personnel. The investigation process will be objective, fair and independent. Further details on the investigation process can be found in the Allianz Procedure for Fraud, Corruption and Other Serious Misconduct Investigations.

When the investigation is complete, a report will be prepared by the Investigation Officer and retained. They will record the investigation comprehensively in order to enable verification.

The Whistleblower Protection Officer will keep the Whistleblower informed of the outcomes of the investigation if this is considered appropriate by the Investigation Officer. This is subject to the considerations of privacy of those against whom the allegations are made and practices of confidentiality within Allianz.

The Whistleblower Protection Officer will provide feedback to the Whistleblower on the progress of dealing with the disclosure submitted by the Whistleblower (where it is appropriate to do so). If a Whistleblower has questions on conclusion of the investigation they can raise these questions with the Whistleblower Protection Officer or by lodging their queries with the Allianz KPMG Faircall Service or BKMS.



## 8. Roles and responsibilities

**Investigation Officer** The Investigation Officer is charged with the responsibility of coordinating and managing the investigation.

They are responsible for determining if there is sufficient evidence to substantiate or otherwise, the alleged Reportable Conduct committed, as reported by the Whistleblower.

The Investigation Officer must be independent from the suspect or the subject of the investigation and have the necessary knowledge, skills and training to manage or to undertake an appropriate investigation. Where appropriate to do so, Allianz Australia may appoint an external party to conduct investigations activity on Allianz's behalf.

### **Allianz Australia Integrity Committee**

The Allianz Australia Integrity Committee (Committee) is responsible for coordinating Allianz's activities concerning integrity related topics with a main focus on the prevention and detection of fraud and corruption.

The Committee is responsible for overseeing an effective anti-fraud and anti-corruption program, maintained in accordance with applicable laws and regulations and Allianz policies and procedures.

The Committee members and its responsibilities is outlined in the Integrity Committee Charter.

### **Whistleblower Protection Officer**

The General Manager Risk Management is appointed as the Whistleblower Protection Officer of Allianz. Where an allegation of reportable conduct is made against the General Manager Risk Management, the Chief People and Culture Officer will be appointed as the Whistleblower Protection Officer.



The role of the WPO is to assist and safeguard the interests of the Whistleblower. In fulfilling their role, the WPO will:

- respond to an Eligible Person query prior to raising Reportable Conduct;
- assess and monitor any risk of retaliation or other detrimental conduct and take the necessary steps to protect the Whistleblower from identified risks;
- maintain the strictest confidentiality of the Whistleblower and may, where required, arrange for the Whistleblower to have access to confidential counselling and independent legal advice; and
- keep secure all files created in the course of their duties; and
- report matters to the Allianz Australia Audit Committee subject to the duty of confidentiality.

### **Corporate Compliance**

General Manager Compliance, or delegate will be responsible for reporting Whistleblower matters to Allianz SE through the ORGS system in line with Group requirements but in consultation with the General Manager Risk Management prior to notification. At all times confidentiality requirements of the Policy must be observed.

Corporate Compliance will provide regular training, awareness and communication to Allianz Australia employees and other persons as required and will include the types of behaviours and scenarios that are reportable. Targeted training will be provided to Senior Managers so they have adequate knowledge and familiarity with this Policy and Whistleblower laws.

### **Chief General Manager**

Chief General Managers are required to champion Allianz Whistleblower Protection by demonstrating their commitment to the programme, protecting and supporting disclosures and identifying and addressing wrongdoing promptly.

# 9. Governance and monitoring

## Record Keeping

All information provided by the Whistleblower in relation to the investigation will be stored securely. Access to information will be managed by the Investigation Officer ensuring that any identifying information is removed. Secure record keeping and access management is in place.

All information provided by the Whistleblower to the WPO will be stored securely. Access to information will be managed by the WPO.

## Reporting

All cases notified to Corporate Compliance relating to any entity of Allianz, will be uploaded in the Compliance Case Management Tool using ORGS system. At all times confidentiality requirements of the Policy must be observed.

The WPO will provide an update to the Board Audit Committee of any new, current and closed investigations on a quarterly basis.

## Risk Appetite

Allianz does not tolerate violations of Whistleblower compliance obligations. Failure to comply can expose the Allianz Group, Allianz and its employees to serious consequences such as reputational damage, financial loss, regulatory and criminal sanctions as well as internal disciplinary action.

## Compliance with this Policy

It is your responsibility to understand and comply with this policy. Allianz Australia will not tolerate any deliberate or wilful actions by any employee to fail to comply with this Policy. Deliberate or wilful non-compliance is considered to be serious and may result in disciplinary action or dismissal. Where a breach of this Policy has or is likely to occur, the breach must be managed in accordance with the Allianz Incident Management Policy and related procedures.

# 10. Definitions and abbreviations

Abbreviation / Term	Description
<b>Business Partner</b>	Includes all agents, representatives, consultants, distributors, vendors, government entities for which Allianz Australia acts, joint venture partners or outsourcing partners or other third parties that Allianz has business dealings with from time to time.
<b>Corruption</b>	Activity that involves the abuse of position or power for an improper personal or business advantage, the term covers both corruption in the public or private sectors and active (paying) or passive (receiving) corruption.
<b>Internal fraud</b>	<p>Any fraud involving Allianz employees, agents or other intermediaries acting on Allianz' behalf. Examples of internal fraud include:</p> <ul style="list-style-type: none"><li>• misappropriation of assets (e.g., manipulation of payment systems, theft and damage);</li><li>• fraudulent financial reporting (e.g., overstatement of assets, understatement of liabilities, including false representation of any performance indicators); and</li><li>• agent related fraud (e.g., illegitimate retention and theft of premium and commission fraud).</li></ul> <p>Collusion between employees and external parties to defraud Allianz is considered to be internal fraud.</p>
<b>Eligible Person</b>	Is a current or former: employee, director, officer, auditor, supplier, contractor or Business Partner (or their current or former employees) or associate; or relatives or dependants of all of the above categories (i.e. any spouse, parent, child, grandchild, sibling or other linear ancestor) who makes a disclosure of Reportable Conduct relating to Allianz Australia.
<b>External Fraud</b>	<p>Involves any theft (of assets or information), hacking or forgery executed intentionally by a third party (for example, customers or external service providers) without the assistance of an internal party. Examples of external fraud include:</p> <ul style="list-style-type: none"><li>• underwriting fraud, being the misrepresentation of a risk at the point of sale or at renewal;</li><li>• claims fraud, being a deceptive and dishonest conduct, involving acts or omissions, or the making of false statements, orally or in writing, with the objective of obtaining a benefit from, or of evading a liability to Allianz; and</li><li>• supplier fraud, being a deceptive and dishonest conduct relating to the provision of goods or services, with the objective of obtaining a benefit from Allianz.</li></ul>

**Reportable Conduct**

Is any information that you have reasonable grounds to suspect concerns misconduct or an improper state of affairs, which includes:

- Suspicion of fraud, theft or corruption;
- An actual or potential criminal offence;
- Breach of the Allianz Code of Conduct;
- Breach of Allianz policies and/or procedures;
- Breach of applicable local, Commonwealth or international laws and regulation (including, but not limited to, Tax and Financial Services legislative violations);
- Actual or likely loss or damage to Allianz assets;
- Deliberate breaches of IT Security controls or Privacy;
- Theft of Intellectual Property;
- Gross mismanagement;
- Bullying and harassment where it is not a personal work-related grievance;
- Activity that represents a danger to the public or financial system;

Constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more. Any other unethical, dishonest or improper conduct which may cause financial or non-financial loss to Allianz, or be otherwise detrimental to the interests of Allianz or its customers.

**We**

Reference to "We" or "we" means Allianz Australia Limited.

**Whistleblower**

Is an Eligible Person who makes a disclosure of Reportable Conduct relating to Allianz Australia.

**You**

Reference to "You", "you", or "your" refers to a Whistleblower or an Eligible Person considering making Reportable Conduct disclosure.

# 11. Relevant legislation and Corporate Rule information

- Corporations Act 2001 (Cth), Part 9.4AAA
- Tax Administration Act 1953
- ASIC Regulatory Guide 270 Whistleblower policies  
<https://download.asic.gov.au/media/5702691/rg270-published-13-november-2019-20200727.pdf>
- ASIC Information Sheet 238 Whistleblower rights and protections
- <https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/whistleblower-rights-and-protections/>
- ASIC information Sheet 239 How ASIC handles whistleblower reports  
<https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/how-asic-handles-whistleblower-reports/>
- AAL Incident Management Policy
- AAL Anti-Fraud Policy
- Integrity Committee Charter
- Procedure for Reporting Fraud, Corruption and Other Serious Misconduct Allegations
- Procedure for Reporting Fraud, Corruption and Other Serious Misconduct to External Authorities
- Procedure for Conduct and Disciplinary Action
- Procedure for Reporting Fraud, Corruption and Other Serious Misconduct Investigations

This list may not incorporate all applicable Federal and State based Legislation, please consult independent legal advisors.





## APPENDIX – CORPORATE RULE INFORMATION

### Authorisation

The Allianz Australia Chief Risk & Compliance Officer is the owner of this Policy and is responsible for maintaining and updating this document. The Policy is reviewed at least annually with any material changes to be approved by the Allianz Australia Board.

This Policy is available on the Allianz website and Allianz corporate intranet and must be included in the Allianz Australia Corporate Rules database.

Corporate Rule Name:	Allianz Australia Policy for Whistleblower Protection
Corporate Rule Category :	2 (Board approved)
Corporate Rule Owner:	Chief Risk & Compliance Officer
Frequency of Review:	Annual
Area of Application:	Allianz Australia Limited including all subsidiary entities
Related AZSE Corporate Rule(s):	Allianz Whistleblowing Guideline (Group Legal & Compliance)

## AMENDMENTS AND UPDATES

Version	Date	Approved by	Key changes from last version
V1	8 November 2018	L Callahan	Change from a Procedure to Policy Level 3
V2	10 July 2019	Board of Directors Allianz Australia Ltd	Update to incorporate new legislation and change to L2 Policy - Board Approved
V3	2020	Board of Directors Allianz Australia Ltd	Update to incorporate ASIC RG270 guidance and annual refresh
V4	2022	Board of Directors Allianz Australia Ltd	Annual Review
V5	2023	Board of Directors Allianz Australia Ltd	Annual Review. Update to incorporate BKMS online submission and reporting channel.
V6	21 November 2024	Board of Directors Allianz Australia Ltd	Annual Review. Update to reflect Valerie Loi, General Manger Risk Management as WPO

