



Allianz
Trade

Allianz Trade Code of Conduct

Doing the right thing to secure the future

Keynote messages

As Allianz Trade moves forward, I am proud to affirm our unwavering commitment to ethical business practices. Our Code of Conduct is not merely a guideline but the very foundation of our corporate identity and success.



In a world of constant change, we continue to prioritize integrity, transparency, and ethical conduct. Being present in over 50 countries, we are committed to maintaining high ethical standards worldwide. This dedication builds trust, fosters lasting relationships, and ensures sound growth.

We integrate our values into our daily work:

- Fairness and respect in all interactions
- Unyielding integrity in decision making
- Transparency in our actions
- Responsibility for our impact

At Allianz Trade, we embody these values that allow us to thrive together with our business partners.

Aylin Somersan Coqui

Group CEO, Allianz Trade

Ethical business practices are essential to our ongoing success.



The Code of Conduct is more than just an integrity policy – it guides how we navigate an ever-evolving global landscape. Our commitment to integrity and ethical behaviour creates a solid foundation of trust with all our stakeholders.

This trust is the key driver behind our continued growth and resilience in the global marketplace.

At the heart of our values are the principles that support us constantly:

- Respecting every individual
- Upholding integrity in our actions
- Promoting openness and honesty
- Holding ourselves accountable

These principles shape the future of our company.

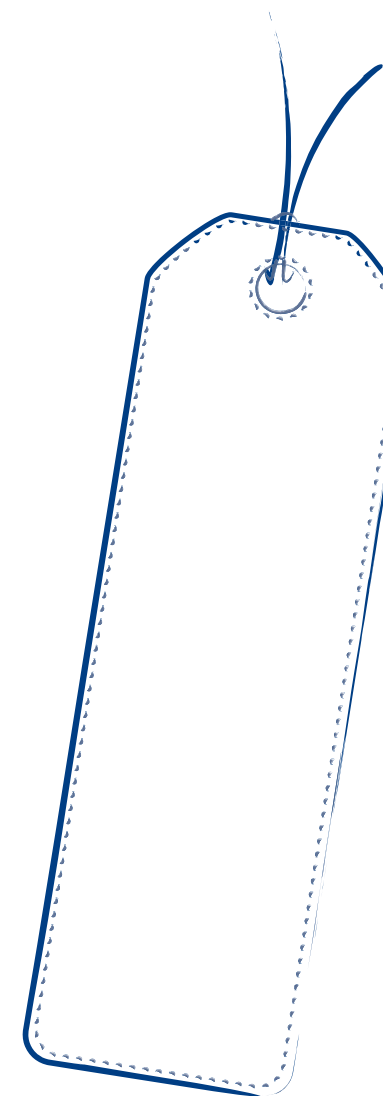
Florence Lecoutre

Member of the Board of Management – Compliance, Data Science, Human Resources, Sustainability & Communication

Table of contents

>> 01	Our Code	5	>> 04	We are transparent and we tell the truth	19
				Open and honest feedback	20
				Voicing concerns	21
				Transparent products and services	22
				External communication	23
				Keeping proper books and records	24
				Interaction with policymakers, regulators and supervisors	25
>> 02	We treat each other fairly and respectfully	6			
	Inclusive workplace	7			
	No discrimination	8			
	No bullying or harassment	9			
	Health and safety	10			
>> 03	We act with integrity	11	>> 05	We take ownership and responsibility	26
	Managing conflicts of interest	12		Sustainability	27
	Free and fair competition	13		Respect for human rights	28
	Preventing financial crime	14		Diligent data management and digital trust	29
	Adhering to economic sanctions	15		Protecting Allianz Trade's assets	30
	Gifts & entertainment	16			
	Observing rules around inside information	17	>> 06	Living the Code	31
	Holding business partners to our standards	18		Support	32

Legal notice	33
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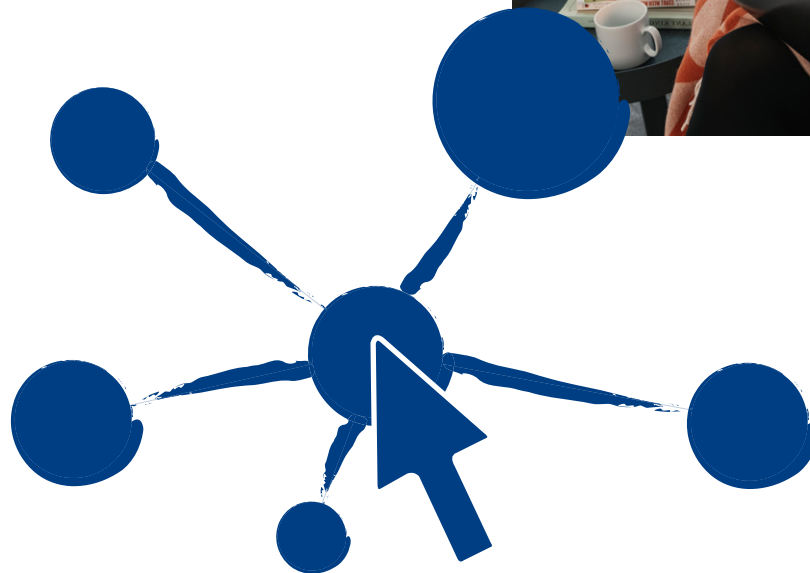
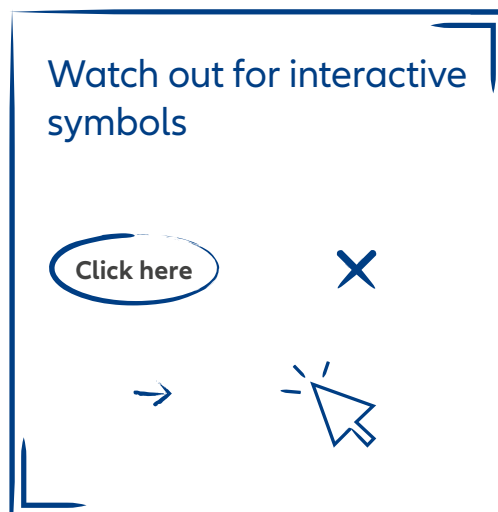


How to use this document

This is an interactive brochure. It has been designed with interactive elements, such as pop-ups and hyperlinks, to help you get the most out of the content.

Interactive symbols as well as **bold** text indicate spots where you can interact and discover additional information – either by clicking or by rollover.

Let's go and start exploring the Code of Conduct!



01

Our
Code

At Allianz Trade, we are defined by our purpose. One simple sentence describes how we approach our business: “We secure your future.” For many years, we have been focused on operating in a manner that secures the financial future of our customers and communities.

We achieve this purpose by conducting business in a way that makes us proud to say we work for Allianz Trade, and makes our customers and partners proud to do business with us.

We are committed to operating in a culture where:



The Allianz Trade Code of Conduct reflects our values and principles and thus gives our employees guidance on their actions and decisions. This is particularly valuable in situations where our own policies or

standards do not provide specific guidance, for example, when we face competing priorities and conflicting demands.

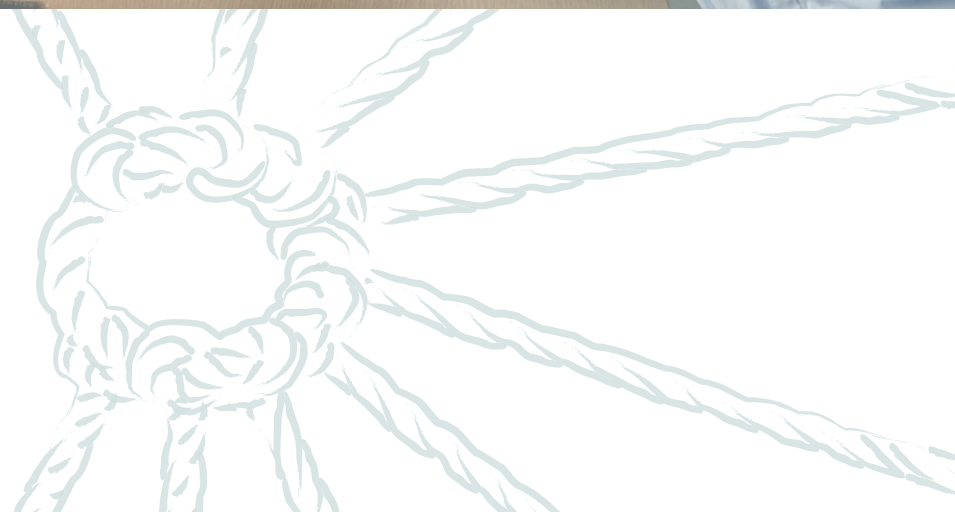
Each of us has a responsibility to live by the principles contained in the Code as well as an expectation that other employees will do the same, be they directors, officers, executives, temporary employees, interns, trainees, or agents. Breaches of the Code can also have serious consequences – for Allianz Trade, and for every one of us. These may include financial losses, fines, reputational damage, and regulatory, criminal or employment-related sanctions.

Finally, we are all expected to promptly report any known or suspected violations of the Code, corporate rules, or applicable laws and regulations. In such cases, we should contact our manager, a trusted leader, our local People and Culture or Compliance function, or we can raise our concerns via the dedicated reporting channels.

02

We treat each other fairly and respectfully

At Allianz Trade, we are stronger together. How we act, how we operate, and the decisions that we make are focused on caring for each other and treating everyone fairly and with respect. The strength of our culture will be the decisive factor in securing the future.



Inclusive workplace

At Allianz Trade, we foster an inclusive workplace, where people and performance both matter, and a culture grounded in integrity, fairness, inclusion and trust. These principles benefit our business and deliver strong results for our employees, customers, partners and shareholders.

We provide a fair workplace where individuals – regardless of characteristics such as gender, age, ethnicity, disability, religion, sexual orientation or cultural background – have equal opportunities and where different perspectives are celebrated.

Creating an inclusive workplace takes commitment from each of us in our daily work, where we respect and value each other's differences and ideas.

We are convinced that our principles and values are fundamental to our success and ensure we deliver on our purpose, "We secure your future".



Practical example: A single parent's project

David and Tania are part of a project team working on developing new insurance solutions that could benefit single parents. Tania describes some of the challenges that single parents can face in the workplace, such as balancing caring for their children with working usual office hours. David dismisses Tania's comments with a shrug and says, "Well, I've worked with single mothers and single fathers, and they seem to do just fine. Maybe when you have as much experience as I do, you'll understand this a little better."

Is David upholding Allianz Trade's commitment to an inclusive workplace?

Fostering an inclusive workplace benefits our business and helps us be considered a credible, trustworthy partner.

No discrimination

Our commitment to an inclusive workplace means we do not tolerate any form of mistreatment of any individual. Discrimination undermines the benefits that different views, ideas, and experiences bring.

At Allianz Trade, we do not tolerate any form of discrimination.

Each of us always treats our coworkers, business partners, and customers respectfully, without regard for any personal characteristics. At Allianz Trade, our performance and abilities are what matter most – regardless of personal background, beliefs, or individual characteristics. Allianz Trade supports an environment of trust, integrity, and respect.

Protected personal and other characteristics

Allianz Trade does not make any employment-related decisions – such as hiring, promoting, assignment of work tasks or dismissal – based on any protected personal or other characteristic.

Discrimination undermines the benefits that different views, ideas, and experiences bring to the table.



No bullying or harassment

We all deserve to work in a collegial, fair, and respectful environment free from bullying and harassment.

We all agree that we would never want to be treated in a way that makes us feel uncomfortable, intimidated, or humiliated. We want to protect ourselves and others from such behavior. Bullying and harassment are unacceptable and run contrary to our values.

Bullying means seeking to harm, coerce, or intimidate someone through abusive language, threatening conduct, and/or other actions that attempt to instill fear in others.

Harassment is any unwelcome or hostile behavior that creates a negative work environment, makes someone feel threatened, or negatively affects someone's work performance.

Examples include:



Intimidation of any kind



Bullying and harassment are never acceptable at Allianz Trade under any circumstances.

If you experience or observe bullying or harassment, consider speaking to the person responsible and letting them know their actions are not acceptable. If you don't feel comfortable talking to them or if the behavior continues, document it and discuss it with your manager, your People and Culture function, a trusted colleague or another company representative (such as a company doctor, a works council representative, or an Occupational Social Counselor).



**Bullying and
harassment are
unacceptable!**

Health and safety

Health is more than not being sick. Reducing feelings of work-related stress and ensuring a healthy workforce, both physically and mentally, is crucial in the office, during mobile work and on business trips. In addition, Allianz Trade supports us in balancing our professional and personal lives and our health, as Allianz Trade is convinced that a healthy workforce is the basis for better results for employees, customers, and shareholders.

Our global occupational health and safety management system is built along the following components:

- Risk experts, responsible for occupational health and safety, are designated.
- Health and safety risk assessments are conducted at least once a year and cover physical safety, workplace safety and mental health.
- Action plans are defined to address medium- and high-risks, including process tracking.

Allianz Trade also offers comprehensive support to promote health and wellbeing at local level. This holistic approach addresses work-related stress, supports employee wellbeing and contributes to resilience.

It is important to us that all local health and safety rules and guidelines are followed to ensure a healthy and safe work environment. These include, among others:

- a) Familiarize yourself with your local health and safety rules, for example, for ergonomic workstations or your fire evacuation plans.
- b) Find out about local health and wellbeing offers, e.g., for sports, mental health support or stress management programs.
- c) Speak to your manager or your local People and Culture function if you are concerned about the impact of work on your or your colleagues' health and safety.



03

We act with integrity



Securing the future means being there for our customers and communities for years to come.

The reputation and brand we have built up over decades will continue to help us achieve this. Both pillars stand on a strong foundation: our integrity. Integrity is the core principle that guides how we conduct business.

At Allianz Trade, we are committed to complying with the laws, regulations, and other applicable requirements that govern our operations, in all jurisdictions in which we operate. The same applies to our internal rules. We do not engage in any business activities that attempt to directly or indirectly breach or circumvent laws or other rules that apply to us.

If you have observed or suspected violations of laws, regulations or Allianz Trade's internal rules, you are expected to speak up. Use the guidance provided in the Code's chapter: **"We are transparent and we tell the truth."**

At Allianz Trade, we go above and beyond simply following the law and hold ourselves to a much higher standard: we strive to do the right thing in every situation. When we are not sure of how to do that, it is always ok to ask questions and get advice.

Managing conflicts of interest

It could happen to any of us! One day, we could find ourselves in a business situation that affects our personal interests, or those of our family members or friends. These interests may be contrary to the interests of the company. It could also happen that we are involved in tasks or functions in our company that are connected with potentially conflicting interests.

Such situations are not only uncomfortable for both the employee and the company, but they can result in poor business decisions.

It is important to recognize that conflicts cannot always be avoided. Also, they may not always cause problems.

However, even if we act absolutely correctly in a conflict situation and make the “right” decision, this may not necessarily be clearly visible from the outside. Suspicion can still arise that “wrong” actions have been taken.

Therefore, transparency is key. Allianz Trade expects employees to disclose any actual or potential conflict of interest to their line manager or superior at an early stage and get direction on how it should best be addressed.

Practical example: A family business

Your team recently completed an important project, and your manager has asked you to organize a lunch to celebrate. Your brother runs a great catering company, and you know he would give you a discount.

Can you hire him to cater the lunch?

Further guidance on how to manage conflicts of interest can be found on the Allianz Trade Compliance Connect Site.



Examples of typical situations that could potentially lead to conflicts of interest:

- An employee of Allianz Trade, together with members of their family, runs a company that has a business relationship with Allianz Trade.
- An Allianz Trade employee has the task of evaluating the implementation of a project in which he was significantly involved in a previous role.



Free and fair competition

Allianz Trade is committed to free and fair competition, which is essential for providing our customers with the best possible solutions to secure their future. All employees must therefore always comply with antitrust and competition laws.

This includes, among other things:

- Making independent decisions about pricing and commercial offerings
- Bidding on contracts fairly and independently
- Avoiding improper information sharing with competitors
- Following trade association participation guidelines

The Allianz Trade Antitrust Code contains behavioral rules that apply to all employees throughout the Allianz Trade Group.

For questions and advice, please contact your Legal department.



Preventing financial crime

Financial crime includes, but is not limited to, corruption, bribery, money laundering, terrorist financing, fraud, tax evasion, and balance sheet falsification. It imposes a significant social and economic impact on both the future of individuals and the future of Allianz Trade.

Allianz Trade does not tolerate financial crime and has implemented measures to prevent, detect and respond appropriately to such activity.

We all play a vital role in preventing, detecting and reporting suspected financial crime. By fostering a culture of vigilance and accountability, we protect all our stakeholders and uphold the trust placed in us. We adhere strictly to all relevant laws and regulations, and we implement robust internal controls and procedures to safeguard our assets and reputation.

Further information on how we prevent financial crime can be found in the respective Allianz Trade Corporate Compliance Rules, on Connect or from your Compliance function.



Allianz Trade does not
tolerate financial crime.

Adhering to economic sanctions



Allianz Trade is firmly committed to conducting business in full compliance with all applicable **Economic Sanctions** →.

This commitment underlies the sanctions compliance processes specified in our compliance corporate rules.

Economic sanctions prohibit or limit the freedom to do business with or for the benefit of sanctioned parties, within sanctioned countries or within specified industries within those countries. Employees who adhere to our sanctions compliance requirements help protect themselves and Allianz Trade against potential penalties, restrictions and reputational risks that could arise if Allianz Trade fails to identify and respect applicable restrictions.



Gifts & entertainment

We think carefully before we offer or accept gifts or entertainment to or from customers, business partners, government officials or other individuals or organizations Allianz Trade deals with.

Gifts and entertainment are an acceptable way to foster professional relationships. In some parts of the world, not only are they acceptable, but they are also an essential business practice. Allianz Trade is committed to respecting local cultures and norms as long as gifts and entertainment provided and received are neither lavish nor excessive and are in no way perceived as a bribe or any form of inducement to influence a business decision.

To avoid the appearance of impropriety, we should always have a business reason for offering or accepting gifts and entertainment – doing so should never appear to be an attempt to influence a business decision.

We are all responsible for thoroughly evaluating all factors before accepting or offering gifts and entertainment. Further information on how we should treat gifts and entertainment can be found in the Allianz Trade Corporate Compliance Rules, on Connect or from your Compliance function.

Practical example: An invitation to dinner

Consider this scenario and think about the question.

Your team was looking for a company to complete a large IT project, and you received bids from several companies, including InfoTech, which eventually won the project. Now, InfoTech has invited your team to a nice dinner at an upscale local restaurant to celebrate the start of the project and to get to know each other better.

Would it be wise for you to accept the invitation?

to reveal the answer.

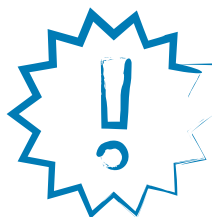


We think carefully
before we offer
or accept gifts or
entertainment.

Observing rules around inside information

Allianz Trade is firmly committed to protecting the integrity and fairness of the capital markets.

As an Allianz Trade employee, you may have access to non-public information. This information must be kept confidential and may be shared only with people who need to know it for legitimate business purposes.



We must never use this information to benefit ourselves or to make investment decisions. Moreover, we may never share such information with anyone else so they can use it to make decisions about buying or selling stocks or any other financial instruments. Doing so would be unethical, illegal and unfair to Allianz Trade and would be unethical, illegal and harmful to the integrity of our company.

Further information on the rules around inside information can be found in the respective Allianz Trade Corporate Compliance Rules, on Connect or from your Compliance function.

Follow the
“need-to-know” principle.



Holding business partners to our standards

We seek to work with business partners (e.g., external suppliers and service providers) and others who share our values and work to uphold the same high standards we do.

The best way to achieve this goal when establishing new or building on existing business relationships is to:

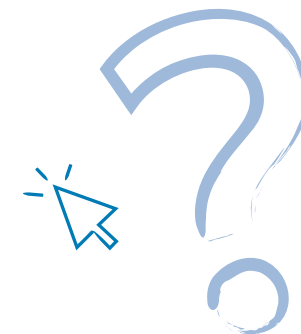
- Involve the Procurement function at an early stage
- Ensure that the principles of integrity, fairness, impartiality and discretion are fully met in the selection process
- Apply thorough due diligence on potential business partners
- Comply with regulatory requirements (for example, local supervisory laws, Digital Operational Resilience Act – DORA, General Data Protection Regulation – GDPR)
- Generally have business partners commit to abide by our Vendor Code of Conduct as well as by other important Allianz Trade standards and rules

Ask yourself:



Have I first looked at the market and alternative suppliers?

Yes No



Never be afraid to ask questions or raise concerns if something doesn't seem quite right.

You can find further guidance in the relevant Corporate Rules on procurement, outsourcing and third-party risk management.

04

We are transparent and we tell the truth

Honesty is one of the cornerstones of how Allianz Trade does business – it supports everything else we do. We are honest with our customers, our shareholders, and the world around us. This helps us provide solutions that secure our customers' futures, and ensure our company will be around for years to come.



Open and honest feedback

It all starts with being honest with each other. At Allianz Trade, we encourage an open exchange of opinions. We are willing to give and receive feedback, even if it involves difficult messages, without fear of retaliation. Feedback is a gift. When we receive feedback from others, we can act to improve our experiences positively. This, in turn, helps Allianz Trade improve its products and business practices.

Likewise, we openly deal with our own mistakes and share lessons learned to prevent others from making the same mistakes. By sharing our experiences and mistakes, we help to improve the organization and make it more resilient.

While all of us are actively involved, our people managers play a key role by inviting everyone within their organization to freely express their views, challenge upwards, participate in decisions, raise mistakes and speak up when they believe something is not right, without fear of retribution. Therefore, people managers need to listen to genuinely hear and understand their employees.



Practical example: Correcting your boss

During a meeting with a client, your manager accidentally misstates Allianz Trade's pricing for a specific policy. You don't think it was intentional, and you don't want to make your boss feel uncomfortable – but clients need accurate information.

What should you do?

to reveal the answer.

It all starts with
being honest with
each other.

Voicing concerns

Allianz Trade encourages you to raise any concerns or issues. If you have any concerns, start by talking to your manager or your local People and Culture partner. Most likely, your manager or People and Culture partner will know the most about your work, can help you answer any questions, resolve anything that does not seem right, or direct you to the right person to get a resolution.



If you are not comfortable speaking to your manager or the People and Culture function, or if your manager or People and Culture function were not able to address your concern, you can also speak to any of the following resources:

- A trusted leader, or
- Your local works council (if applicable), or
- Your Compliance function

For serious misconduct, such as criminal offenses, violations of laws or significant breaches of duties under the employment contract, you can use the secure and confidential Allianz Trade whistleblowing tool, operated by the Compliance function.

Reports submitted through the whistleblowing tool may be made anonymously. You are protected if you report in good faith, even if the examination does not confirm your concern. Allianz Trade takes all reports seriously and will examine them promptly and with the utmost diligence through trained personnel.

Practical example: Saving money

You work in the claims department, and you've noticed on several occasions that one of your colleagues, Julia, often pays customers too little money for their claims – less than she should, according to the terms of their policy. When you asked Julia about it, she said, "I'm saving Allianz Trade money, so I don't see what the problem is." You also mentioned the situation to your manager, who told you to let it go. Nothing has changed, yet you are worried customers may not be receiving the payment they deserve.

What should you do?

Tell another colleague and trust that they will do something about it.

Report your concerns to your manager's manager, contact Compliance or make your report using the available confidential employee reporting tools.

Nothing; you've done everything you can.



Transparent products and services

Being fair and transparent with our customers about our products and services, including their limitations and risks, is key to building their long-term trust.

Therefore, we strive to adhere to customer protection principles throughout the entire product life cycle, from the initial design of a new product to after-sales support. These principles help ensure that our product offerings are centered around our customers by:

1

Delivering timely, clear, fair, accurate and consistent information to customers



Further information on how they apply can be found in the respective Allianz Trade Corporate Compliance Rules, on Connect or from your Compliance function.



External communication

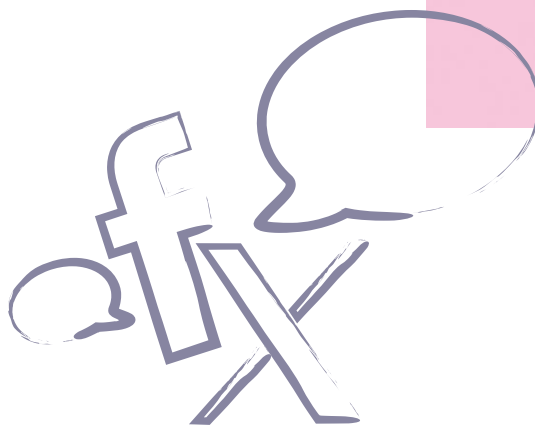
We're proud to tell the world about the great work Allianz Trade does. Still, it is important to ensure we share the right information and follow basic guidelines.

If journalists or the media contact us, we do not speak on Allianz Trade's behalf unless we're authorized to do so. You should refer any journalists or media professionals to an official Allianz Trade spokesperson or the Head of Communications in your country. Whether a Board member, expert or any employee, interviews should be conducted, as a matter of principle, in the presence of a spokesperson.

The content we publish can influence how Allianz Trade is perceived by business partners, customers, shareholders, media and other stakeholders, creating material business impact. Therefore, the behaviors and values expected of Allianz Trade employees should be upheld on any social media platform, just as they would in the workplace.

When talking about Allianz Trade on social media, such as Facebook, X (formerly Twitter), LinkedIn, Instagram, online message boards, or any other online forum, we never share any confidential information, information that has not been made public yet, or content intended for internal use only. When communicating on social media and identifying as an Allianz Trade employee, we are required to disclose when our opinion is our own.

If you want to learn more, visit Group Communications & Corporate Affairs.



Keeping proper books and records

Every employee is responsible for keeping Allianz Trade's books and records accurate, complete, timely and truthful.

What are books and records?

Books and records are the official documents, and system records, a business keeps to track its transactions, financials, and compliance with legal requirements, e.g.:

- Contracts, emails, policy documents, and other documents we create during our work for Allianz Trade
- Expense reports
- Invoices
- Financial disclosures and statements

Why is keeping proper books and records important?

- Properly documenting our work helps each of us perform at our best.
- By documenting in accordance with our document and information management rules, we ensure compliance with applicable record-keeping laws.
- It also helps us make good decisions and keep our shareholders informed about Allianz Trade's performance.



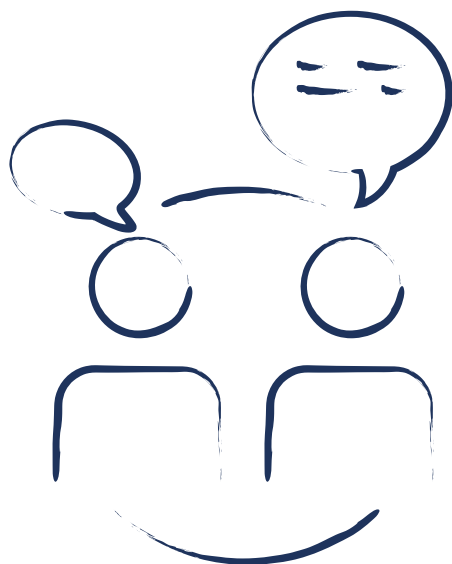
Interaction with policymakers, regulators and supervisors

Allianz Trade maintains transparent and respectful interactions with governments, regulators and supervisors ("policymakers"). This refers to every touchpoint, for example, regular contacts as well as requests, examinations or investigations. We strive for diligent, timely responses that provide an accurate and fair view.

In some countries and regions (e.g., Germany, the EU and the US), governments have established Lobbying or Transparency Registers and respective codes of conduct

with the aim of making representation of interests ("lobbying") transparent. We adhere to these laws and regulations where they exist and involve the respective representatives listed in the Lobbying or Transparency Registers before representing Allianz Trade's interests to policymakers.

See Allianz SE's entries in the European Transparency Register and the German Lobbying Register.



05

We take ownership and responsibility

For many years, Allianz Trade has strengthened societal resilience and growth. With our expertise in prevention, insurance, and investment, we act as a trusted partner to people and businesses navigating the effects of climate and social change, supporting the transition to more sustainable economies.

That will not change going forward – we will continue to secure the future of our customers and communities, sustainably.

Taking ownership doesn't just mean taking responsibility for the work we do for Allianz Trade – it means that we also take responsibility for our power to make an impact on the world.



Sustainability

In the face of environmental challenges like climate change, Allianz Trade has made sustainability a cornerstone of our strategy – recognizing that understanding and addressing sustainability issues is essential to managing risks and seizing new opportunities.

We aim to integrate sustainability across our business activities, from insurance, proprietary investments, and asset management to our own operations. Our approach involves assessing risks, impacts, and opportunities; setting clear targets; measuring and reporting progress; and engaging with stakeholders beyond our company. We integrate environmental and social considerations into our products, services, and community initiatives – all to support decarbonization, support sustainable growth, deliver long-term value to our shareholders, and most importantly, protect our customers' most valued assets.

As Allianz Trade employees, we have a shared responsibility and opportunity to support the Group's sustainability objectives and uphold our commitment to responsible business practices.

to find out how each of us can make a personal contribution to achieving these objectives and thereby benefit the environment and society.



We believe that a sustainable society requires transforming economies to benefit as many people as possible without compromising the wellbeing of future generations and the planet.

Respect for human rights

Allianz Trade is committed to respecting international **human rights** → and we want to make sure that we are not complicit in human rights abuses.

If you work for Allianz Trade, you are expected to respect human rights in everything you do for your job. That also involves knowing your business partners. Because at Allianz Trade, we also expect the companies we buy goods and services from, and the companies we insure and invest in, to respect human rights. To live up to our human rights commitment, we have established due diligence processes in our operations and business areas. They are listed on our human rights website on Allianz.com and in detail in our Sustainability Statement (chapters on own workforce and workers in the value chain).

Please be vigilant for any risks to, or violations of, human rights in our offices or at our business partners. If you have concerns, speak to your manager, use our secure and confidential reporting line, or contact human.rights@allianz.com.



Allianz Trade is committed to respecting international human rights and core labor standards.

Diligent data management and digital trust

Our customers, partners and colleagues trust us with a wealth of personal and corporate information and details of their lives and businesses.

To earn and maintain the trust they place in us, we must handle this data transparently, with due care and in a fair and lawful manner. Therefore, we use personal data only for specified and legitimate purposes and retain it only for as long as necessary. We never disclose it to anyone who is not authorized to access it, and we maintain comprehensive processes to ensure we fulfill individuals' privacy requests.

We ensure that Allianz Trade's business-relevant information is handled diligently and that comprehensive controls are in place to maintain the accuracy and quality of our data. We protect both the data entrusted to us and the data developed within Allianz Trade through appropriate security measures. This helps us prevent harm to our business, uphold the required

level of confidentiality, and ensure compliance with information security and document retention obligations.

Beyond the safeguarding of confidential and personal data, Allianz Trade actively embraces the opportunities and challenges presented by big data analytics and Artificial Intelligence (AI). Leveraging these technologies is a key strategic objective aimed at delivering value to our customers, shareholders and employees. At the same time, we are committed to using AI responsibly, ethically and in a trustworthy manner. This includes ensuring that AI systems are transparent, accurate, secure, and free from discrimination. Our responsible approach to AI serves as a cornerstone for fostering long-term innovation, building trust, and supporting sustainable growth.

Please refer to the relevant Allianz Trade Corporate Rules for more information.



We handle data responsibly, transparently, with due care and in a fair and lawful manner.

Protecting Allianz Trade's assets

We are responsible for protecting Allianz Trade's **assets** → as we would our own. We protect them in the same way.



We use the company's assets responsibly. This helps Allianz Trade succeed and us do our best work for our customers and communities.



We understand that the correct care of our intellectual property ensures and enhances its strength and value.



We therefore use our brand as one of our most valuable assets, always in compliance with the brand guidelines and any further guidance from the Marketing and Legal functions.



We do not leave sensitive information unattended. We label it with the appropriate confidentiality information and never share it with anyone who doesn't need to know it.



If you have questions about using the brand, sensitive information or any other intellectual property correctly, speak to your manager or contact the Legal function.

06

Living the Code

「We secure your future.」

**Let's strive to do it right –
with passion, every day.**

As we said in the beginning, sometimes it can be challenging to do what is right. If you find yourself in such a situation, use our Code as a guide to stay on the right track.

Let us all contribute to securing people's lives by making good decisions and giving our customers and communities the courage for what lies ahead.



Support

Please do not hesitate to seek support if you have any questions, concerns, or suspicions regarding violations of the Code of Conduct.

Your line manager, your People and Culture department and your Compliance function are happy to help.

Furthermore, you can always reach out to compliance@allianz-trade.com for additional support.



Legal notice

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EULER HERMES Group SAS

46, Rue Arago
92915 Paris La Défense Cedex
France
www.eulerhermes.com

EULER HERMES SA

Avenue des Arts 56,
1000 Brussels
Belgium
www.eulerhermes.com

Design, concept und production

IKW team GmbH
www.ikw.team