

Allianz Life Insurance Company of North America

# Vendor Code of Conduct

For all that's ahead.®

**Allianz** 

## Overview

Allianz Life is committed to conducting business in an environment of ethics and integrity, and in compliance with all applicable laws. We are committed to conducting business this way as it aligns with our corporate values (Integrity, Caring, Excellence, Respect), but also because it's the right thing to do.

What follows is the Allianz Life "Vendor Code of Conduct", which provides topic specific guidance on how we operate and what is expected of our vendors. While this guide contains information on vendor requirements, it is impossible to cite every possible scenario and therefore should not be viewed as an 'all inclusive' list of responsibilities.

### 1. General

Defined: This document will apply to all 3<sup>rd</sup> Party Vendors (individuals, groups, or organizations that provide contractually referenced products or services to Allianz Life), collectively referred to as "vendor" or "vendors". Additionally we expect all vendors to hold their associates and supply chain to these same standards when working on Allianz Life related endeavors.

Laws: Vendor is required to comply with all applicable laws, including applicable federal, state, local, and agency laws of the United States, as well as applicable laws in the country of manufacture of your products or any country from which your services are provided.

### 2. Employment Practices

Wage Law: Vendors will provide employees with compensation that includes wages, overtime pay, and benefits that meet or exceed the legal minimum standards for the jurisdiction in which they operate. Employees will be paid in a timely fashion.

Safe Environment: Vendor will comply with all applicable workplace safety and health laws and regulations in the jurisdictions where the vendor operates. Vendors must comply with all labor laws and employ only workers who meet applicable minimum age requirements in the jurisdiction. Vendor must also provide a non-violent, safe work environment, free of threats or intimidation or physical harm that also supports accident prevention and minimizes exposure to health risks.

Conflict of Interest: Vendor will avoid any conflicts of interest or the appearance of a conflict of interest. Vendors shall disclose all actual or potential conflicts of interest due to either business or professional relationships between the vendor, Allianz Life, customers, competitors, or employees.

Gifts & Entertainment: Allianz Life employees are not permitted to give or receive anything of value intended to influence a decision. Modest gifts or entertainment may be accepted from Vendors to celebrate a milestone or as a token of appreciation; however the value of the gift or entertainment may not exceed \$100 per 12-month period.

Discrimination & Harassment: Vendor shall commit to a workplace free of harassment of any kind and shall prohibit harassment and unlawful discrimination in the workplace.

## **Business Practices**

Privacy, Data, and Asset Security: Vendors will protect all confidential information, including personal information (Personal Health Information- PHI and Personal Identifiable Information- PII) disclosed to or collected from or on behalf of Allianz Life. Vendor will take all necessary technical, procedural, and administrative safeguards to prevent its unauthorized access, use, disclosure, or loss. Upon termination of the contract, Vendor will cooperate with all activities to remove individual access, return data, return assets, and terminate the usage of licensed software. Additionally, vendor will immediately notify Allianz Life in the event of an alleged, assumed, suspected, or confirmed breach of any type of data security associated with Allianz Life data.

Anti-Corruption/Bribery: Vendors will conduct themselves in a fair, reasonable, and honest manner. Vendors shall not engage in corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage. Vendor shall abide by all applicable ant-corruption laws and regulations of the countries in which it operates, including the Foreign Corrupt Practices Act (FCPA) and applicable international anti-corruption conventions.

Fair Practice/Antitrust: Vendor will (at all times) deal fairly and honestly with Allianz Life and in its general business activities. Vendor will not take unfair advantage of others through manipulation, concealment, abuse of confidential information, misrepresentation, or other unfair business practices.

Vendors will comply with all domestic and international antitrust and competition laws and regulations to avoid any action that would illegally restrain or thwart the efforts of competitors. Banned activities include: practices in restraint of trade such as price fixing, group boycotting, bid rigging, offering or taking bribes, and accepting kickbacks.

Insider Trading: The Vendor and its employees will avoid insider trading by not buying or selling Allianz SE stock or client stock when in possession of material information about Allianz or the client that is not available to the investing public and that could influence an investor's decision to buy or sell such stock.

### 3. Summary

Reporting Incidents: The Vendor and its employees are required to promptly report any known or suspected breach of this code to Allianz Life. This applies whether the breach, suspected breach or activity involves you, Allianz Life, or another company or individual with whom Allianz Life does business. The Vendor and reporter will provide any additional information required for the reported violation. Allianz Life takes all breaches and suspected breaches seriously and thus requires that they be investigated and responded to in a timely fashion. Both the Vendor and the reporter shall cooperate fully with all such investigations. See Appendix A for information on how to report incidents.

Retaliation: Vendor shall have a policy that prohibits retaliation and protects those reporters who, in good faith, report abuse, intimidation, discrimination, harassment, or any violation of law or of this code or who assist in the investigation of any such report.

Right to Audit/Corrective Action: Allianz Life may require a vendor to provide information or documentation regarding the vendor's compliance with this code. Additionally, Allianz Life reserves the right to audit our vendors to determine compliance with this code and requires vendors to reasonably cooperate with any audit.

### Appendix A: Reporting incidents

Allianz Life requires each vendor to report violations or suspected violations of this code promptly to Allianz Life. Reports can be made using any of the following modalities:

1. Report directly to the business owner assigned to manage the relationship between Allianz Life and the vendor.
2. Allianz Life Integrity Hotline at: 866-595-0063 or [www.allianzintegrityline.com](http://www.allianzintegrityline.com) . Both the Integrity Line and website are operated by an independent service provider, are available at all hours of the day and night, and offer the option to report anonymously. Reports made to the Integrity Line or the website are sent to the Allianz Life Ethics Office for further investigation, review, and action.
3. Email the Allianz Ethics Office at: [Ethics.Office@allianzlife.com](mailto:Ethics.Office@allianzlife.com)

REMINDER: Allianz Life does not tolerate any retribution or retaliation taken against any individual who has in good faith reports questionable behavior or a possible violation.

# Revision History

<b>Date</b>	<b>Revision Change Number</b>	<b>Summary</b>	<b>Reference Section</b>
9/14/2018	1.0	Policy Implementation	