

## Allianz Ayudhya Standard for Anti-Corruption

Allianz Ayudhya Capital Public Company Limited, Allianz Ayudhya General Insurance Public Company Limited and Allianz Ayudhya Assurance Public Company Limited, as a member of the Allianz Group and collectively referred to as “the Company”, are responsible for combating bribery and corruption, and must do so as part of its day-to-day business in accordance with applicable laws. To this end, the Company must ensure effective compliance with applicable rules and regulations for anti-bribery and anti-corruption compliance, including establishing and maintaining appropriate risk-based policies and procedures with clearly defined responsibilities for executing relevant tasks (including identifying relevant counterparties, performing appropriate compliance due diligence and establishing all other controls necessary to meet the requirements of this Standard as well as local law).

The reputation of Allianz is based on the trust which clients, shareholders, Employees and the general public have in the integrity of Allianz. The Allianz Group Code of Conduct therefore defines integrity as the core principle of how Allianz chooses to conduct business.

Building on the foundation set by the Code of Conduct, this Standard defines the core principles that determine how Allianz seeks to prevent, detect and react appropriately to bribery and corruption.

The Standard applies to all employees, management, divisions, branches, representatives, counterparties, and outsourcing partners.

### Responsibilities and Organizational Obligations

1. The respective OE Board of Management is responsible for establishing and maintaining a sound and clearly defined organizational and operational set-up to ensure compliance with this Standard. This includes establishing an organizational set-up to ensure that all processes and frameworks required within this Standard are performed and/or adhered to by the OE’s first line of defense and overseen by its second line of defense.
2. Each Employee is responsible for maintaining vigilance towards preventing and detecting bribery and corruption, including misconduct (perpetrated internally), and for ensuring that the company’s assets, reputation, resources and information are properly protected.

### Definitions, Abbreviations and Glossary

For the purpose of this Standard, the following definitions will be applied:

Abbreviation/Term	Description
<b>Books &amp; Records Red Flags List</b>	The list consisting of certain pre-defined early warning indicators (red flags) for assessing the effectiveness of existing controls around the maintenance of Books & Records. The current version of the Books and Records Red Flags list is available as an Excel file that can be downloaded directly from Group Compliance’s pages on Allianz Connect.
<b>Bribery</b>	Situation when a corrupt offer, solicitation or promise is made to obtain an improper personal or business advantage.
<b>Corruption</b>	Abuse of a position of power for an improper personal advantage.
<b>Employee</b>	Any individual who works part time or full-time under a contract of employment with the relevant entity, as well as other persons who act on behalf of the relevant entity within the scope of its business activities and who are therefore in a similar position to Employees, but who are not employed by the relevant entity (e.g. self-employed or temporary workers).

Abbreviation/Term	Description
<b>Entertainment</b>	includes all forms of entertainment, including but not limited to any social event, hospitality event, cultural event, concert, charitable event, leisure activity, conference, seminar, marketing event, sporting event or an event of like nature. An event qualifies as Entertainment only if the representative of the inviting party is present (e.g., an Allianz Employee). Where this is not the case the gift rules and applicable restrictions (e.g., local gift cap) apply. Any Gift provided to or received at an entertainment event retains its status as a Gift and is subject to the restrictions applicable to Gifts.
<b>Facilitation Payment</b>	Any payment to a Public Official to expedite or secure the performance of a routine, non-discretionary and legitimate governmental action, such as granting a visa, issuing customs clearance, granting a license or providing a regulatory approval.
<b>Gift</b>	is any tangible item received at any time, as well as any invitation to an event where the inviting party will not be present.
<b>Misconduct</b>	Illegal or otherwise improper conduct committed by an Employee
<b>OE</b>	Operating Entity
<b>Public Official</b>	A Public Official is any person holding a legislative, administrative or judicial office (either appointed or elected), any officer or employee of a government or any department, agency or instrumentality thereof, any officer or employee of a public enterprise (e.g. state-owned/state- controlled enterprises), any officer or employee of a public international organization (e.g. the World Bank, the World Trade Organization, the United Nations), or any person acting in an official capacity or exercising a public function for or on behalf of any such government or department, agency or instrumentality or public enterprise or for or on behalf of any such public international organization as well as any political party, party official, or political candidate. The term covers local and foreign public officials and immediate family members (parents, spouses, children, in-laws, siblings), and anyone else to whom the Public Official provides material support.
<b>Senior Management</b>	An officer or a senior employee of an OE with sufficient knowledge of the OE's financial crime risk exposure, and with the authority to make decisions in this respect.

## Anti-Bribery and Anti-Corruption Compliance

Allianz is committed to complying with all applicable anti-bribery and anti-corruption laws and regulations in all jurisdictions in which it operates.

Allianz's **CORE PRINCIPLES** for anti-bribery and anti-corruption compliance are:

(1) Allianz does not tolerate bribery and corruption

Employees are strictly prohibited from directly or indirectly offering, requesting, accepting, providing, paying, soliciting, promising, authorizing or receiving 'Anything of Value' (defined broadly to include anything - monetary or non-monetary - that provides a benefit of any kind) to or from any Public Official or anyone in the private sector, in order to obtain or retain business or an improper personal or business advantage.

(2) Allianz does not make Facilitation Payments

Employees are prohibited from directly or indirectly giving or authorizing any Facilitation Payments. A Facilitation Payment is any payment to a Public Official to expedite or secure the performance of a routine, non-discretionary and legitimate governmental action, such as granting a visa, issuing customs clearance, granting a license or providing a regulatory approval.

(3) Red Flags for Intermediaries

Allianz's commitment to transparency and integrity in its business dealings extends to tied agents and other sales intermediaries acting on behalf of Allianz, as unlawful acts or omissions of those may expose Allianz to risk even if Allianz did not specifically authorize such acts. When engaging a new tied agent or other sales intermediary, Allianz requires the Red Flags List for Intermediaries to be followed (including completion of all required steps) in order to identify and mitigate possible reputational, legal or regulatory risk of such engagements.

Contracts with Intermediaries are required to include Allianz's Anti-corruption clause.

(4) Allianz maintains proper books and records

Books and records need to be accurate, complete, timely, and truthful. They need to accurately and fairly reflect all transactions and dispositions of assets.

No false, misleading or incomplete entries must ever be made in the books and records of Allianz for any reason. No undisclosed or unrecorded funds or accounts for or on behalf of Allianz may be established for any purpose. All expenses must be accurately accounted for, be based on appropriate supporting documentation and be promptly recorded in the books and records. Non Allianz resources or payment channels (e.g., private accounts) may never be used to commit or enable bribery or corruption.

To assess the effectiveness of existing controls around the maintenance of books and records and to define enhanced mitigation measures, a Books & Records Red Flags List has to be completed annually.

(5) Allianz does not make political or charitable contributions for improper purposes

Political Contributions: Political contributions (including contributions to political organizations, campaigns, parties, representatives or candidates) made on behalf of Allianz are allowed only if there is no purpose to improperly influence or induce a benefit for Allianz. Any political contributions constituting bribery or corruption are prohibited.

Charitable Contributions: Charitable contributions (e.g., sponsorships/donations to charitable organizations of Public Officials or their relatives) made on behalf of Allianz must only be given to bona fide charitable organizations for proper charitable purposes and must not violate the Allianz Group Code of Conduct, these core principles related to anti-bribery, anti-corruption and anti-fraud, applicable laws and regulations or the Allianz Ayudhya Guidance for Charitable Contribution. The Company must verify the integrity of the charitable organization by performing an integrity check before any contribution is made.

Charitable contributions may never be provided as a condition for or to influence an official action or decision.

(6) The giving and receiving of improper gifts or entertainment is prohibited

The term G&E includes all types of Gifts as well as Entertainment that are offered by or on behalf of Allianz to, or received by an Employee of Allianz from, a Customer or other third party (such as a Public Official) with whom Allianz has a current business relationship or is seeking a future business relationship. It includes G&E offered directly and indirectly (such as G&E provided to close relatives or associates of the Employee, Customer, Public Official, rather than to the Employee, Customer, Public Official directly).

Invitations offered by or on behalf of Allianz as part of sponsoring, strategy or marketing events organized by Group or local Strategy, Marketing and Distribution departments must be evaluated.

Giving and receiving gifts and invitations to entertainment events (“G&E”) is a customary way to strengthen business relationships and, with some restrictions, it is a legitimate business practice. All G&E must comply with the Company’s specified conditions and must be consulted on and approved in accordance with the Company’s G&E requirements.

It is the responsibility of each Employee to properly record all G&E provided or received in the tool provided by the Company to properly record the transactions, including of the results of approval and consultation requests.

(7) Allianz offers and manages Sponsoring & Hospitality appropriately to mitigate the risk of corruption

Sponsoring is the financial support of individuals, organizations or events in order to support the communication, strategic and/or marketing goals of Allianz. Unlike a Gift, Sponsoring is generally a larger, more focused show of support.

Hospitality refers to various types of entertainment events that are organized by Group Strategy, Marketing, Distribution (or by the Company’s departments responsible for local marketing and strategy), and to which Allianz Customers and/or business partners are invited. Hospitality events are structured events rather than discrete individual invitations.

If the Company undertakes Sponsoring and/or Hospitality events, the conditions and approval procedures applicable for Sponsoring concepts and Hospitality offerings must be followed.

### **Training and Awareness of Employees**

The CORE PRINCIPLES on training and awareness, which apply throughout the Allianz Group, are:

1. Awareness

Fostering the right culture begins with the requirement for the Company’s Senior Management to provide adequate tone from the top messages to Employees to underscore the importance of the anti-bribery and anti-corruption compliance program.

The Company is required to communicate and disseminate relevant details of the anti-bribery and anti-corruption policies and procedures to Employees, management and (where appropriate) to relevant intermediaries, including tied agents.

2. Training

The Anti-Corruption relevant training is provided to Employees and relevant third parties acting on behalf of Allianz, to ensure adequate knowledge of and familiarity with the requirements of this Standard. Training must be based on a training needs analysis policy and procedure that specifies clear principles, objectives, scope, rules, conditions, and frequency of training.

3. Reporting of Compliance Failures

The Company must make sure that Employees are aware of the systems or channels through which they can raise bribery and corruption related concerns or compliance failures related to the requirements of this Standard. This may be via the internal whistleblowing tool, or via other channels as applicable and appropriate.

### **Discipline and Disciplinary Actions**

All Employees have the duty and responsibility to strictly adhere to the company's rules, regulations, orders, announcements, employee directives, and codes of conduct.

Disciplinary actions may include:

- Verbal/written warning
- Deduction of bonuses
- Demotion
- Suspension
- Termination of employment

These actions will be determined based on the severity of the misconduct, considering factors such as intent, circumstances, opportunity, or consequences of the violation, cooperation in work, and past contributions and merits.

**The Company has a policy not to demote, punish or adversely affect employees who refuse to engage in corruption. Even if that action will cause the company to lose business opportunities.**

### **Standard Review**

The Standard will be reviewed at least once per year by the Compliance, who is assigned overall responsibility for this Standard and is responsible for maintaining and updating this document. The content of this document has been reviewed and approved by President and CEO/Board of Directors.

### **Standard Effective Date**

- Allianz Ayudhya Assurance Public Company Limited: 1 December 2025
- Allianz Ayudhya General Insurance Public Company Limited: 1 December 2025
- Allianz Ayudhya Capital Public Company Limited: 26 February 2026