

Allianz Life Insurance Company of North America

Manager's Ethics Toolkit

Tools to help you promote ethics in
your day-to-day interactions with
your employees.



Think. Trust. Decide.

Allianz 

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Dear Employees,

As employees of Allianz Life, we have each made a promise to act ethically and with integrity. As leaders, each of us is responsible for living that promise as prescribed in our Code of Conduct. To help ensure we achieve this, we've created this guide to demonstrate reminders of what that means and tips on how to live this promise.

Whether you are new to supervising staff or a veteran with years of experience, your responsibilities are not limited to just administrative tasks and team building activities. As a leader of people, you are also responsible for promoting integrity and ethical behavior throughout the organization.

What follows is the Allianz Life Manager's Ethics Toolkit. This toolkit is a brief guide to help you in your responsibilities as a leader in the organization. It contains reminders and advice on the ethics and values at Allianz, an explanation of your role as an ethical leader, and examples and tips for strengthening your ethical leadership. The guide also highlights corporate policies that are outlined in our Code of Conduct and key to our culture.

Allianz Life is a principles based organization; in other words we don't have policies for every scenario nor do we have examples of every possible situation that can occur. Instead, we utilize the principles and values of our organization and guides like this one to help us apply those principles to individual situations. In short, we strive to do the right thing.

Think. Trust. Decide. You play a role in maintaining our ethical culture. Think before you act; consider issues from all perspectives. Trust your inner values; if an action doesn't feel right, then it probably isn't. Decide to do the right thing; to maintain our ethical culture we all need to make good decisions.

The information contained in this toolkit is valuable, but it is not all inclusive. We each face decisions and unique dilemmas where a little help is appreciated. If you ever need assistance or a different perspective to consider ideas and options, please don't hesitate to either contact me or any member of the Ethics Team at ethics.office@allianzlife.com.

Warmest regards,

Steve Koslow
Chief Ethics and Compliance Officer

1.

Ethics and values at Allianz



Integrity

We always act in ways that make us proud to say we work here.



Caring

We're actively engaged in the well-being of our co-workers, customers, and community.



Excellence

Passion for our business drives us to consistently exceed expectations.



Respect

We succeed because of the value we place in each other's contributions.

Our values represent us internally – what we bring to work with us every day. They help guide our internal decision making and provide an ethical and moral compass.

Values and ethics

Our values are meant to be upheld and were designed to provide direction and clarity when you are confronted with any decision you may face in the course of doing business.

Defining the right path Our values enable you to reflect and choose the best direction.

As a manager at Allianz Life, it is your responsibility to follow, to live, and to promote our Code of Conduct and values.



Think before you act.
Trust your inner values.
Decide to do the right thing.

Think
before you act

- Be sure to consider issues from all perspectives.
- We are all responsible for making ethical decisions every day.
- Our values help guide the decisions we make.

Trust
your inner values

- If something doesn't feel right, it probably isn't.
- If you have questions, utilize your resources. A trusted leader, HR, and the Ethics Office are all available to assist you.

Decide
to do the right thing

- Do the right thing, even when no one is looking.
- To maintain our ethical culture we all need to make good decisions.

Integrity or ethics? What's the difference?



2.

The role of a manager

You are a leader and you set the example

Your employees may spend more time interacting with you than they do with their own families.

Employees are keen observers of their managers' behaviors.



You must walk the walk, not just talk the talk. The manager sets the tone for the entire team.

Employees watch and emulate how their managers react to ethical decisions.



Over 70% of employees choose their manager to discuss ethical matters.

Employees are coming to you for direction.



Are you setting the right example?

As a manager, you need to know the difference between **personal ethics** and **business ethics**...



Personal ethics are the values and judgments that you, as an individual, hold true. Personal ethics can vary in nature and degree from one person to another.

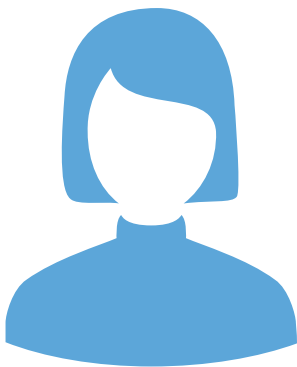


Business ethics are the agreed upon values and principles of Allianz Life and are followed by our employees. These are the guiding principles of how we conduct business.

...and you need to help your employees know the difference too.

Let's apply it to the real world

A client is 67 and recently applied to purchase an annuity from Allianz. Based on suitability requirements, the policy was not issued.



You **personally** feel that people should be able to do what they want with their money.



Allianz Life has set specific suitability standards and determined that the sale was not suitable for the client based on those standards.

As an employee you have the right to your personal opinions, ethics, and beliefs but the **business ethics** of Allianz Life must always be the guiding force in the business decisions that we make.

3.

Ethical decision guide



THINK before you act
TRUST your inner values
DECIDE to do the right thing

Eight questions to ask yourself:

Answering these questions honestly will help guide you through difficult situations.

- 1 Is it legal?
.....
- 2 Does it comply with our policies?
.....
- 3 Does it reflect our values and culture?
.....
- 4 Does it protect our goals and interests?
.....
- 5 Is it in the best interest of our stakeholders?
.....
- 6 Can the action withstand public scrutiny?
.....
- 7 Would your friends, family, and community approve?
.....
- 8 Is it the right thing to do?

How do your answers stack up?

Did you answer NO to any questions?

Don't do it. The action could have serious consequences for Allianz and for you.

Were all your answers yes?

The action appears appropriate and you are helping us live our promises.

Not sure?

Talk to your manager or another trusted leader, or you can contact the Ethics Office.

Ethical Decision Guide

You are a leader

Lead by example; conduct business with integrity and use ethical business practices.

You have responsibility

You play a critical role in promoting ethical behavior in the workplace.

You have support

Allianz has a number of resources to help guide you through difficult situations.

These questions will help you act in accordance with our values of integrity, caring, excellence, and respect. **Ask them frequently. Answer them honestly.**

STILL HAVE QUESTIONS OR SUSPECT MISCONDUCT?

- Contact your manager, supervisor, or another trusted leader
- Contact the Allianz Integrity Line at www.AllianzIntegrityLine.com or 866.595.0063 (option to remain anonymous)
- Contact HRONCALL at AZLHRONCALL@allianzlife.com or 855.462.9547
- Email the Ethics Office at ethics.office@allianzlife.com

4.

Having the conversation

Tips for talking to your employees about ethics and integrity

Ensure employees understand the difference between personal and business ethics.



Talk to employees candidly about ethics and integrity, ethical dilemmas, and ethical decision making. The more often you talk with them, the more likely they are to come forward when they have a concern.



Include our values and ethics as agenda items at department meetings.



Keep the discussions relevant and interesting.

Enlist the help of your leaders when talking about ethics and integrity. They may even have an experience they are willing to talk about with your team.

Talk about ethics and integrity in team meetings, white boards, and one-on-ones.

Ideas for keeping the conversation going

- *In the news* – Bring a recent news story that focuses on someone making (or not making) an ethical decision. Have employees tie it back to something that could happen at Allianz.
- *What would you do?* Share an ethical dilemma and talk through what options are available. Ask employees to share which option they would take and why.
- *Personal examples* – Discuss your experiences with your employees. Talk through what happened and what you did in response.
- *Recognition* - Recognize employees' decisions that support our ethical culture.

The most important aspect of communication with your employees is active listening



Tips for being an active listener

Set the employee at ease – Do not act annoyed or burdened by the information they are sharing. If it's important enough for them to come to you, it's important for you to take the time to listen.

Listen – Let the employee tell their story. Speak only to ask clarifying questions and keep these to a minimum.

Remain calm and interested – Don't overreact or minimize the situation. Save judgments and reactions for later.

Don't assign blame – There will be time in the future to assess blame and consequences; the point now is to gather information.

Document – Keep brief notes, including the date and time, without distracting from the conversation. Afterwards, document in detail what was said and your response.

Know the limits – Don't make promises. You have only heard one side of the story. You CAN promise that there will be no retaliation for reporting in good faith.

5.

Reporting and resources

Employees have many reporting options

Encourage your employees to contact any one of the many resources available to them if they have a concern.

Resources available

Direct manager or another trusted member of Allianz Life leadership

Integrity Hotline (option to remain anonymous)
866.595.0063 or www.allianzintegrityline.com

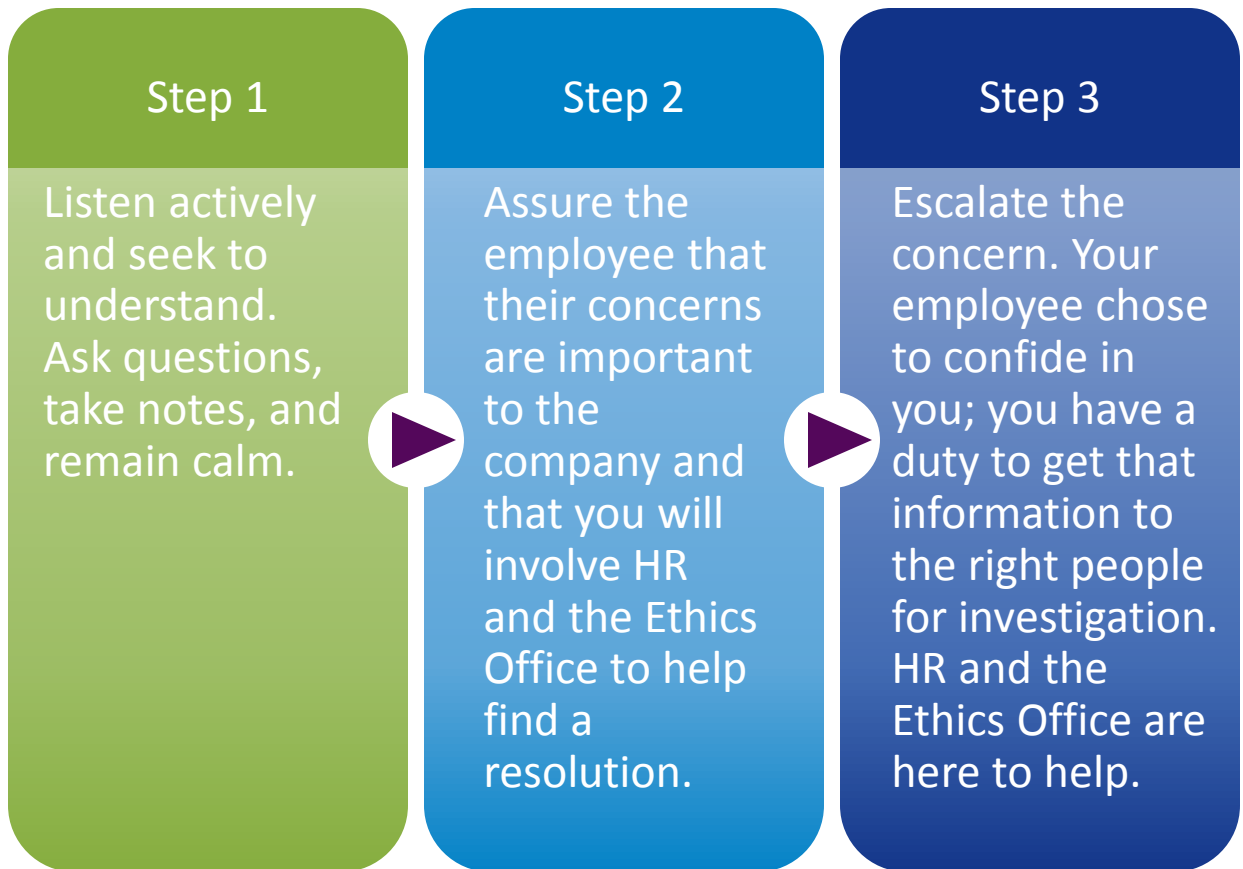
Ethics and Compliance
ethics.office@allianzlife.com

Human Resources
AZLHRONCALL@allianzlife.com

Important!

An employee's decision to use the Allianz Integrity Line instead of coming to you is not a negative reflection on your abilities as a manager. Don't take it personally.

What if an employee chooses to come to you with an ethical dilemma or to report a violation?



You have resources too!

- Email the Ethics Office at ethics.office@allianzlife.com
- Call HRonCall for Managers at x36844
- Review your HR for Managers training
- Look to the Code of Conduct

Depending on the nature of the issue, an employee may wish for the matter to remain confidential. How do you handle this request?

We will handle each matter with a high degree of care and sensitivity.

More information may be needed to conduct an investigation. Employees should respond to requests and follow up with the Allianz Integrity Line if they chose to report anonymously.

You must let your employee know that you are required to take action once you are made aware of certain activities.

You do not have the authority to grant confidentiality or anonymity, so refrain from promising either.

From the Code of Conduct:

“All employees are required to promptly report any awareness of an ethical issue or violation of our company policies. Failure to report is itself a violation of our company values and policies.”

...So encourage your employees to report.

The Allianz Integrity Line isn't like other reporting methods at Allianz

1

Employees can contact the hotline 24/7.

2

The hotline can be accessed by calling 866.595.0063 or online at AllianzIntegrityLine.com.

3

Employees have the option of remaining anonymous.

4

The hotline and website are administered by a 3rd party vendor, so reports are truly anonymous.

5

Allianz Life cannot obtain any details on the employee if they choose to report anonymously.

6

Computer IP addresses are not tracked and phone numbers are not logged.

7

Managers are not entitled to be informed of employees who utilize the Allianz Integrity Line.

What happens after an employee reports?



01

Build the team

First, the report is assessed by a cross-functional team to determine what areas need to participate in the investigation. (ie. Compliance, HR, Legal, SIU, etc.)



02

Investigate

Second, the investigation occurs. This may include collecting documentation, conducting interviews, and assessing the facts.



03

Make a decision

Third, a determination is made and communicated to the participants. This includes any necessary actions, corrections, or changes.



04

Take action

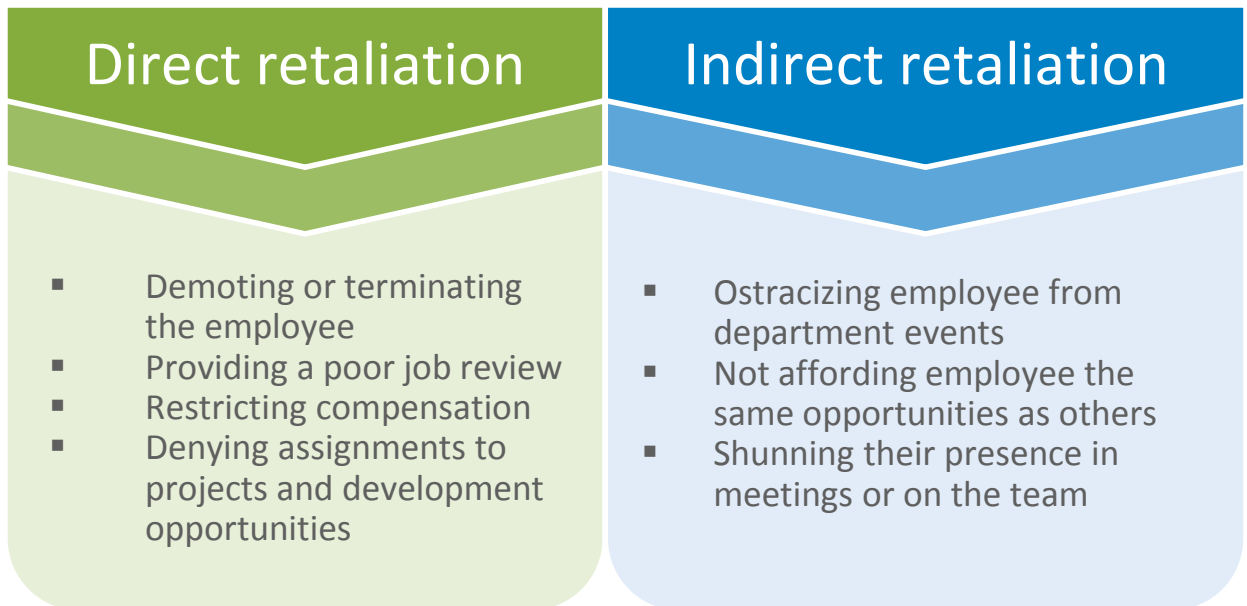
Fourth, follow up activities commence. This includes taking corrective action and monitoring for any retaliatory activities.

6.

Retaliation

Retaliation – just don't do it

Employees who report suspected illegal or unethical behavior must not face any negative consequences for speaking up. Retaliation is strictly prohibited when an employee reports in good faith.



From the Code of Conduct:

“Allianz strictly prohibits any retaliation or harassment for reporting a concern. Retaliation violates the Code, could be a violation of law, and will result in appropriate discipline.”

...So don't do it.

Our ethics are derived from our culture, our values, and our policies.

Your responsibilities as a manager:



Act with integrity and promote an ethical culture.



React appropriately when you or your employees are faced with an ethical dilemma.



Understand the reporting options available to you and your employees.



Know the limitations of confidentiality and anonymity.



Uphold our zero-tolerance standard for retaliation.

If you have any questions, please contact the Ethics Office at ethics.office@allianzlife.com.

