



# WHISTLEBLOWER POLICY

## 1. Purpose

At Allianz Australia Life Insurance Limited (AA Life), 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 AA Life 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 AA Life 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, company secretarial staff, contractors and suppliers of AA Life (including employees of suppliers or contractors) and associates, as well as relatives, current or former dependents or dependents of spouses of any of these people (each, an Eligible Person). All Eligible Persons are eligible for protection under this Policy.

**AA Life'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.**

## 2. Principles

### Speak up and report

AA Life 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, AA Life encourages its employees to speak up about any concerns relating to unethical conduct, bullying and harassment and any other improper conduct. Speaking up enables AA Life to live and enforce the zero-tolerance principle for behaviour which is not in line with our Code of Conduct, People Attributes and Target Culture.

### AA Life's expectation of its people

AA Life 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

AA Life 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 AA Life 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 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. AA Life will conduct the investigation in accordance with relevant laws and internal policies.

## AA Life's commitment to Whistleblower protection

AA Life will not tolerate detrimental conduct against Whistleblowers. AA Life will look to protect the identity of people who make a report. Your identity (and any information AA Life has because of your report that someone could likely use to work out your identity) will only be disclosed if you give your consent to AA Life 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 AA Life's legal obligations including ensuring that appropriate procedures 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 AA Life 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:

<b>Work related grievances*</b>	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ Personal work-related grievances should be reported to Human Resources in the first instance in accordance with the AA Life Procedure for Reporting Fraud, Corruption and Other Serious Misconduct Allegations.</li> </ul>
<b>Customer complaints</b>	<ul style="list-style-type: none"> <li>▪ Customer complaints are generally excluded from the definition of Reportable Conduct. If you are a customer and are dissatisfied with the way AA Life has dealt with a particular matter, product or service including an existing complaint, please contact us with your concerns via phone, email or online.</li> </ul>

\* *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 disclose Reportable Conduct you should satisfy yourself that you have reasonable grounds to suspect potential misconduct. You don't need to prove your allegations; a disclosure can still qualify for protection even if

the disclosure turns out to be incorrect. However, you obviously must not make a report that you know is not true or is misleading. We expect everyone to speak up and report a concern as soon as possible.

### Who can a report be made to?

<b>You can report to our Whistleblower Protection Officer:</b>	David Peiris, Head of Compliance AA Life Email: <a href="mailto:david.peiris@allianz.com.au">david.peiris@allianz.com.au</a>
<b>If you would prefer to make your report to someone else at AA Life, you can report to:</b>	Sandra Bridgewater-Dunn, Senior HR Business Partner AA Life Email: <a href="mailto:Sandra.bridgewater@allianzretireplus.com.au">Sandra.bridgewater@allianzretireplus.com.au</a>

Alternatively, you can report via the following Whistleblower Services, KPMG FairCall (phone, mail) or Allianz Group (online):

<b>Allianz Whistleblower Services:</b>	
<b>Phone submission</b> (KPMG Fair Call)	1800 059 798
<b>Online submission</b> (Allianz Group)	<a href="https://www.bkms-system.com/Allianz">https://www.bkms-system.com/Allianz</a>
<b>Mail</b> (KPMG Fair Call)	The FairCall Manager KPMG Forensic PO Box H67 Australia Square Sydney NSW 1213

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

- Chief Audit Executive
- External Auditor
- Appointed Actuary
- Company Secretary
- Any of our Senior Management Team
- Managing Director
- Any of the AA Life Board of Directors.

Eligible Recipients are required to provide details of the report in a confidential manner to the Whistleblower Protection Officer without undue delay.

However, we do encourage you to report to our Whistleblower Protection Officer or our Whistleblower Services outlined in the table above.

### Reporting anonymously

You can choose to make your disclosure anonymously and to remain anonymous over the course of the investigation and after the investigation is finalised. You may also refuse to answer questions that you feel could reveal your identity. If you report to any of the Eligible Recipients noted above including the Whistleblower

Protection Officer, 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 Allianz Group BKMS online reporting channel. You will still be protected under the Whistleblower Laws.

When making an anonymous report using our Allianz Whistleblower Services, we ask that you provide as much information as possible for the reason that requiring complete anonymity may practically make it more difficult for us to investigate the issue or take the action we need. When you call the KPMG FairCall 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. Alternatively, the Allianz Group BKMS online reporting channel allows you to communicate with the responsible person (investigator) anonymously (via a secured mailbox). If you prefer not to disclose your identity in your report, you will simply be required to register in the system using any user name you choose, together with a personal code.

### **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 Whistleblower Protection Officer is to protect you as a Whistleblower. Where an allegation is made against the Head of Compliance, the Senior HR Business Partner will be appointed as the Whistleblower Protection Officer.

### **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 Whistleblower Protection Officer or our Senior HR Business Partner. However, if you require legal advice with respect to your obligations under this Policy or the Whistleblower Laws, then you must contact an independent lawyer.

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 listed above or to ASIC, APRA or another Commonwealth body prescribed by regulation; or
- 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' (under certain circumstances); 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 AA Life or a related body corporate, a registered tax agent or BAS agent who provides tax services or BAS services to AA Life or related body corporate, an employee or officer of AA Life 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 detrimental conduct
- 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). We recommend that you contact an independent legal adviser before making an ‘emergency disclosure’ or a ‘public interest disclosure’.

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 AA Life 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 Whistleblower Protection Officer is allowed or required by law to do so.

However, you should be aware that in certain circumstances the Whistleblower Protection Officer 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; and
- 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. You may lodge a complaint with us if you believe there has been a breach of this confidentiality, or with a regulator such as ASIC, APRA or the ATO.

## **II. AA Life’s commitment to your protection as a Whistleblower**

AA Life 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. This includes, but is not limited to:

- 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 AA Life (such as counselling or other support services); and/or
- rectifying any detriment that you have suffered.

You should tell the Whistleblower Protection Officer if you or someone else, is being, or has been subject to detrimental conduct. AA Life 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 Whistleblower Protection Officer directly or via the Allianz Group BKMS reporting channel or KPMG FairCall.**

## 6. Your obligations as a Whistleblower

### False or misleading disclosures

- When making a disclosure, you are expected to have reasonable grounds to suspect the information you are disclosing is true, but you will not be subject to a penalty if the information turns out to be incorrect.
- However, a disclosure is not protected if it is found to be frivolous, vexatious or made in an attempt to avoid dismissal or disciplinary action. The Investigation Officer will undertake a review of the disclosure and seek legal advice if required to determine the nature of such a disclosure. This includes providing you an opportunity to explain why such a disclosure is not frivolous, vexatious or made in an attempt to avoid dismissal or disciplinary action.
- 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 TriLine and communicated to the Whistleblower by the Whistleblower Protection Officer where appropriate.

All investigations will be conducted by appropriately skilled and experienced personnel and in a timely manner which may vary depending on the nature of the disclosure. The investigation process will be objective, fair and independent. Further details on the investigation process can be found in the AA Life 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 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 AA Life.

The Whistleblower Protection Officer will provide feedback to the Whistleblower on the progress of dealing with the complaint submitted by the Whistleblower (where it is appropriate to do so).

An employee who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required or appropriate in the circumstances. Prior to any decision on disciplinary measures an employee who is the subject of a disclosure has the right to respond to the allegations in person. This meeting if requested should be held with the involvement of AA Life's HR Business Partner and the Investigation Officer. An employee who is the subject of a disclosure may access support from AA Life (such as counselling or other support services).

## 8. Roles and responsibilities

<b>Investigation Officer</b>	<p>The Investigation Officer is charged with the responsibility of conducting 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 undertake an appropriate investigation.</p>
<b>AA Life Audit Committee</b>	<p>The AA Life Audit Committee (BAC) is responsible for amongst other matters coordinating and overseeing an effective whistleblower program</p> <p>The Committee members and its responsibilities is outlined in the Board Audit Committee Charter.</p>
<b>AA Life Board Risk Committee</b>	<p>The AA Life Board Risk Committee (BRC) is responsible for amongst other matters coordinating AA Life activities concerning the prevention and detection of fraud and corruption.</p> <p>The Committee is responsible for overseeing an effective anti-fraud and anti-corruption program, maintained in accordance with applicable laws and regulations.</p> <p>The Committee members and its responsibilities is outlined in the Board Risk Committee Charter.</p>
<b>Whistleblower Protection Officer (WPO)</b>	<p>The Head of Compliance (or delegate) is appointed as the Whistleblower Protection Officer (WPO) of AA Life. Where an allegation of Fraud or Corruption is made against the Head of Compliance, the Senior HR Business Partner will be appointed as the Whistleblower Protection Officer.</p> <p>The role of the WPO is to assist and safeguard the interests of the Whistleblower. In fulfilling their role, the WPO will:</p> <ul style="list-style-type: none"> <li>▪ respond to an Eligible Person query prior to raising Reportable Conduct;</li> <li>▪ assess and monitor any risk of retaliation or other detrimental conduct and take the necessary steps to protect the Whistleblower from identified risks;</li> <li>▪ 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;</li> <li>▪ keep secure all files created in the course of their duties; and</li> <li>▪ report matters to the Board Audit Committee subject to the duty of confidentiality.</li> </ul>

<b>Compliance</b>	<p>Compliance will be responsible for reporting Whistleblower matters to Allianz SE through the Compliance Case Management Tool (CCMT) in line with Group requirements in consultation with the Senior HR Business Partner prior to notification. At all times confidentiality requirements of the Policy must be observed.</p> <p>Compliance will provide regular training, awareness and communication to AA Life employees and other persons as required, and will include the types of behaviours and scenarios that are reportable.</p> <p>Targeted training will be provided to Senior Managers so they have adequate knowledge and familiarity with this Policy and Whistleblower laws.</p>
<b>Senior Management Team (SMT) members</b>	<p>SMT Members are required to champion AA Life's Whistleblower Protection by demonstrating their commitment to the programme, protecting and supporting disclosures and identifying and addressing wrongdoing promptly.</p>

## 9. Governance and monitoring

<b>Record keeping</b>	<p>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.</p> <p>All information provided by the Whistleblower to the Whistleblower Protection Officer (WPO) will be stored securely. Access to information will be managed by the WPO.</p>
<b>Reporting</b>	<p><b>Board Reporting</b></p> <p>The Whistleblower Protections Officer will provide an update to the Board Audit Committee and/or the Board Risk Committee of any new, current and closed whistleblower investigations on a quarterly basis.</p> <p><b>Group Reporting</b></p> <p>Any case of internal fraud or misconduct received by Compliance or any Allianz entity which fulfils one or more of the escalation criteria is classified as a "<b>Major Case</b>" and must be reported to Group Compliance immediately via the CCMT:</p> <ul style="list-style-type: none"> <li>• Any allegation against the CEO, CFO or any other executive reporting directly to the CEO or other safeguarding function (such as Compliance, Risk, Internal Audit, Legal or Finance).</li> <li>• Any case of potential corruption (no threshold).</li> <li>• Any case of discrimination, harassment or other activity that may have serious impact on Allianz's reputation.</li> <li>• Any case relating to physical threat, extortion/blackmailing or other serious issue relating to physical safety of persons.</li> <li>• Any alleged violations of antitrust law must be reported immediately to Group Legal.</li> </ul> <p>Any cases of internal fraud or misconduct not falling within the definition of <b>Major Case</b> are classified as <b>Standard Cases</b> and must be uploaded to the CCMT not later than within the month that they became known to AA Life Compliance.</p>
<b>Risk appetite</b>	<p>Allianz does not tolerate violations of Whistleblower compliance obligations. Failure to comply can expose the Allianz Group, AA Life and its employees to serious consequences such as reputational damage, financial loss, regulatory and criminal sanctions as well as internal disciplinary action.</p>



<b>Compliance with this policy</b>	It is your responsibility to understand and comply with this Policy. AA Life 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 AA Life Incident and Breaches Policy and related procedures.
<b>Access to policy</b>	This Policy is available on the AA Life website and in the AA Life TriLine system (for employees only)

## 10. Definitions and abbreviations

Abbreviation/Term	Description
<b>Business Partner</b>	Includes all agents, representatives, consultants, distributors, vendors, government entities for which AA Life acts, joint venture partners or outsourcing partners or other third parties that AA Life 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 AA Life employees, agents or other intermediaries acting on AA Life's 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 AA Life is considered to be internal fraud.</p>
<b>Eligible Person</b>	Is a current or former employee, current or former director or 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 AA Life.

Internal

<p><b>Emergency Disclosure</b></p>	<p>Disclosure of information to a journalist or parliamentarian, where:</p> <ul style="list-style-type: none"> <li>a) the discloser has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation;</li> <li>b) the discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;</li> <li>c) before making the emergency disclosure, the discloser has given written notice to the body in (a) above that: (i) includes sufficient information to identify the previous disclosure; and (ii) states that the discloser intends to make an emergency disclosure; and</li> <li>d) the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.</li> </ul>
<p><b>External Fraud</b></p>	<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>▪ 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 AA Life;</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 AA Life; and</li> <li>▪ investor 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 the application or redemption process.</li> </ul>
<p><b>Public Interest Disclosure</b></p>	<p>Disclosure of information to a journalist or a parliamentarian, where:</p> <ul style="list-style-type: none"> <li>a) at least 90 days have passed since the discloser made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation;</li> <li>b) the discloser does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure;</li> <li>c) the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and</li> <li>d) before making the public interest disclosure, the discloser has given written notice to the body in (a) above that: (i) includes sufficient information to identify the previous disclosure; and (ii) states that the discloser intends to make a public interest disclosure.</li> </ul>

<b>Reportable Conduct</b>	<p>Is any information that you have reasonable grounds to suspect concerns misconduct or an improper state of affairs, which includes:</p> <ul style="list-style-type: none"> <li>▪ Suspicion of fraud, theft or corruption;</li> <li>▪ An actual or potential criminal offence;</li> <li>▪ Breach of the Code of Conduct;</li> <li>▪ Breach of AA Life policies and/or procedures;</li> <li>▪ Breach of applicable local, Commonwealth or international laws and regulation (including, but not limited to, Tax, Financial Services and Superannuation legislative violations);</li> <li>▪ Actual or likely loss or damage to AA Life assets;</li> <li>▪ Deliberate breaches of IT Security controls or Privacy</li> <li>▪ Theft of Intellectual Property (IP)</li> <li>▪ Gross mismanagement;</li> <li>▪ Bullying and harassment;</li> <li>▪ Activity that represents a danger to the public or financial system;</li> <li>▪ Constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;</li> <li>▪ Any other unethical, dishonest or improper conduct which may cause financial or non-financial loss to AA Life, or be otherwise detrimental to the interests of AA Life or its customers.</li> </ul>
<b>We</b>	Reference to “We” or “we” means AA Life.
<b>Whistleblower</b>	Is an Eligible Person who makes a disclosure of Reportable Conduct relating to AA Life.
<b>You</b>	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

Relevant legislation and Corporate Rules:

- Corporations Act 2001 (Cth), Part 9.4AAA
- Tax Administration Act 1953
- ASIC Regulatory Guide 270 Whistleblower policies
- ASIC Information Sheet 238 Whistleblower rights and protections
- ASIC information Sheet 239 How ASIC handles Whistleblower reports
- AA Life Anti-Fraud Policy
- Procedure for Reporting Fraud, Corruption and Other Serious Misconduct Allegations
- Procedure for Fraud, Corruption and Other Serious Misconduct Investigations.

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

## Internal

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