



ALLIANZ GROUP

Tax Strategy

01 Our tax approach and strategy

The purpose of this document is to set our key strategic tax objectives, provide clarity on our approach to tax and the roles and responsibilities. Our Group Tax Strategy is applicable to all Allianz Group entities and it covers all taxes (direct and indirect).

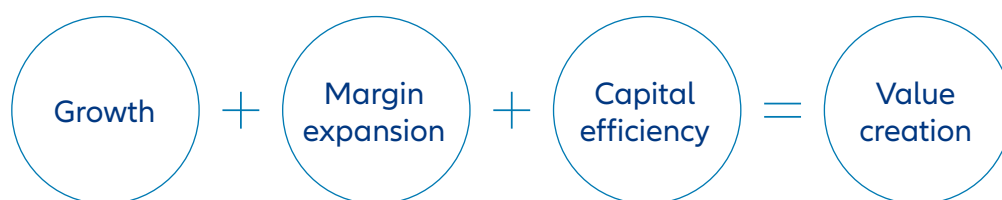
Our tax approach

Our ambition is to take a responsible approach to the management of taxes. We aim for being recognized as a compliant, co-operative and reliable taxpayer in each country we operate. Hereby, we endorse The B Team¹ Responsible Tax Principles².

Our tax strategy

The Board of Management of Allianz has set the following strategic objectives for the medium-term business strategy with the motto "Simplicity at scale"³.

"Simplicity at scale"³



Furthermore, we have set ourselves the goal of being a leading company in terms of sustainability. By following our purpose 'We secure your future' we create a positive social and environmental impact through the way we run our business. The taxes we pay are an important part of our contribution to the economic and sustainable development of the countries in which Allianz operates.

The Allianz Code of Conduct⁴ reflects our values and principles and thus gives our employees overall guidance in their actions and decisions to do the right thing to secure the future. All employees are encouraged to speak-up and report any possible misconduct they believe violates the Allianz Code of Conduct, any laws, regulations or internal rules (SpeakUp@Allianz⁵).

Our Group Tax Strategy is designed to support Allianz Group's business and sustainability strategy by setting the following key strategic tax objectives:

- **Value creation** and supporting sustainable business growth by ensuring efficient tax management carefully balancing stakeholders' interests.
- **Responsible tax behavior** by being a compliant, co-operative, and reliable taxpayer in each country where we operate.

1 The B Team is a movement of global business leaders advocating for new norms of corporate leadership grounded in sustainability, equality and accountability. The CEO of Allianz SE serves on the B Team's Climate and Governance Working Groups.

2 See the B Team website (<https://bteam.org/assets/reports/A-New-Bar-for-Responsible-Tax.pdf>)

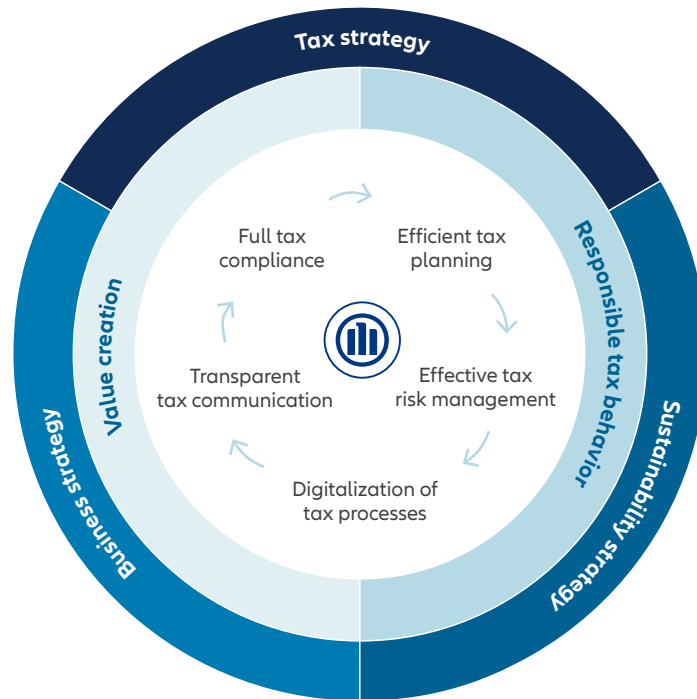
3 See Allianz Group website ([Strategy \(allianz.com\)](https://www.allianz.com/strategy))

4 See Allianz Group website ([Code of Conduct \(allianz.com\)](https://www.allianz.com/code-of-conduct))

5 See Allianz Group website ([Voice Your Concerns \(allianz.com\)](https://www.allianz.com/voice-your-concerns))

02 Our tax principles

Based on our key strategic tax objectives the following tax principles have been set by Allianz Group and everyone is expected to adhere to them.



1. Full tax compliance

We are committed to complying with all relevant national and international tax laws and tax related regulations in every country we are operating. This, by applying the following:

- Complete, accurate and timely preparation and submission of tax returns
- Correct and timely payment of taxes
- Adherence to global and local documentation and notification requirements
- Compliance with internal and external tax reporting obligations
- Implementation of Tax Compliance Management Systems with certifications, where possible.

02 Our tax principles

2. Efficient tax planning

We seek efficiency in the management of tax matters in order to create value for our stakeholders, including investors, policyholders, suppliers and employees. In making business decisions we take tax into account like any other cost. When there is more than one way to structure a business arrangement we will take a holistic approach, considering all factors including tax. We may decide for a solution with lower tax cost, following a reasonable interpretation and application of tax rules guided by the following:

- Adherence to the spirit and letter of tax law
- No engagement in aggressive tax planning structures or artificial structuring that lacks business purpose or economic substance
- Refraining from use of abusive tax schemes or planning practices for the sole purpose to avoid taxes
- Refraining from discretionary tax arrangements
- Use of tax incentives only in case publicly available and consistent with statutory or regulatory frameworks
- No transactions or agreements with customers or any other external party with the primary purpose to avoid taxes
- Refraining from Allianz products designed for or encourage tax avoidance.

Our approach to tax havens

As a general rule we do not engage in tax haven jurisdictions. Exceptions can be made if there is a valid business reason for the engagement (e.g. operating business, client interest, valid business purpose for an investment). The sole purpose of achieving tax advantages and avoidance of paying our fair tax share on activities taking place elsewhere are not to be seen as valid business reasons.

We regard the fact that a country is included in the EU list as non-cooperative jurisdiction and has an overall income tax rate of below 10% as an indication for a so-called tax haven country. For countries included in the EU list of non-cooperative jurisdictions and for certain other regularly reviewed countries we apply the following decision criteria before investing.

In case of contemplated acquisitions or investments in a jurisdictions which fulfill the criteria above, solid business reasons must be given and pre-alignment with the Group tax function is mandatory. With regard to investment activities in or through tax haven jurisdictions where our participation rate is below 10% (so-called portfolio investments) and the investment income is taxed at shareholder/investor level, the inherent risk is considered as acceptable for the Group. If one of these criteria is not met a case by case decision in the responsibility of the Group tax function has to be taken. Our decision will be guided by considering if

- there are specific business reasons for that jurisdiction,
- there is a reduction of taxation resulting from the structure
- the income is taxed at shareholder/investor level at the statutory tax rate for that income type.

02 Our tax principles

Consolidated participations

Any presence of Allianz Group subsidiaries carrying out operative insurance, reinsurance or asset management activities in nil or low taxed jurisdictions must be driven by business or regulatory purposes.

Non-consolidated investments

Our insurance companies hold diversified investment portfolios that include so-called alternative assets: equity, debt, or fund investments in real estate or infrastructure or private equity. These are asset classes that are particularly beneficial for the policyholder during low-interest periods. These investments can include fund products that are structured with various legal entities in different jurisdictions, which can contain low or nil tax countries. In these cases our investment will rarely exceed 10% of the total fund volume. Regardless of the lower-tier tax burden, income from such an investment is generally subject to further taxation in the country of residence of the investing Allianz entity.

Our asset management entities, PIMCO and Allianz Global Investors, have fund-related entities in various jurisdictions. In accordance with international practice, most of them are established in countries that do not impose an additional layer of taxes on the fund itself. This ensures that, when the investment return is taxed at the customer's level in their country of residence, their tax position is the same as if they had made the investment directly. Regardless of where the fund invests, tax will be paid in accordance with the tax rules of those countries; it is not intended that Allianz Group companies derive tax advantages from the fund jurisdictions. This procedure also applies in those cases where, due to commercial and regulatory reasons, the fund-related entities are established in tax haven jurisdictions.

Our transfer pricing approach

We disclose international activities and transactions with and between Group subsidiaries to the relevant tax authorities as part of our tax returns or other filing requirements. We ensure that the pricing for intra-group activities is consistent with the OECD arm's length principle as well as with local transfer pricing rules to pay adequate tax on profits where the value is created. As such, transfer pricing is not used by us for profit shifting and we are committed to complying with the regulations of every tax jurisdiction in which we operate regarding the transfer pricing documentation and notification requirements.

3. Effective tax risk management

The Board of Management of Allianz SE bears the overall responsibility for a sound business organization at Group level, particularly setting and approving a system of governance, a risk management framework and internal policies. Allianz applies a 'three-lines-of-defense' model in our Internal Control System to clearly allocate the duties to manage risks. Our approach to tax risks is consistent with and embedded in Allianz general approach to risk management. We actively and continuously identify, assess, monitor and manage tax risks to ensure that they remain in line with our business and strategic objective, taking into account Allianz's appetite towards tax risks.

02 Our tax principles

Allianz might be exposed to different tax risks or uncertainties when taking a tax position.



Operational Risk Calculation and processes

Data used for calculation of taxes is incorrect or wrongly processed

Under-collection or under-payment of taxes

Typical risk areas

Routine business like compilation of tax returns, collection/payment of taxes (e.g. wage taxes, insurance premium taxes)



Operational Risk Compliance

Uncertainties under the relevant tax law are interpreted differently by tax authorities

Typical risk areas

Mergers and acquisitions, Group internal transactions, interpretation of newly introduced tax regulations



Operational Risk Financial misstatement

Tax positions in the financial statements are wrongly calculated/assessed or incorrectly disclosed

Typical risk areas

Local and Group financial statements



Reputational Risk

Reputation of the Group or a Group company is damaged impacting or changing stakeholders' perception

Typical risk areas

Press articles, litigations

As Allianz's appetite for tax risk is low we seek to minimize those tax risks. Effective tax risk management is ensured via the following means:

- Set-up of sound organization for appropriate tax management
- Setting of tax standards and rules with clear accountabilities to minimize risks
- Consistent approach to tax topics across the Group
- Handling of tax-related topics by tax experts that are highly qualified, with an in-depth tax and business expertise
- Securing continuous learning and development
- Usage of efficient control-based and IT-supported processes
- Seeking of external advice in case of uncertainty
- Discussions with tax authorities in order to seek clearance in advance (e.g. usage of offered options for dispute resolution in a non-litigious way)
- Adequate reserving for uncertain tax positions
- Continuous monitoring of effectiveness of tax risk management by the Group tax function via institutionalized oversight processes.

02 Our tax principles

4. Digitalization of tax processes

Digitalization of tax management and compliance processes is key to ensure steady efficiency gains and to support the integrity of tax-relevant data in times with increasing complexity in tax regulations and reporting requirements. We enforce digitalization by applying the following:

- Implementation of control-based and IT-supported processes as well as digital tax tools
- Group-wide and uniform application of IT-supported processes
- Continuous review and improvement of processes.

5. Transparent tax communication

In accordance with our Code of Conduct we have committed ourselves to trustworthy and transparent communication with all stakeholders. This includes also taxes.

We always welcomed the work at national and international level for transparent and fair tax systems and are committed to regulations that strike a fair balance between the interests of governments and companies as taxpayers. Being engaged in several associations we develop our tax positions in dialogue with key stakeholders and present them transparently. Discussions with stakeholders (e.g. B-Team) encourage and influence the development of Allianz positions. We gain feedback on changing stakeholder expectations through our participation in various sustainability ratings and benchmark studies.

Our communication is based on the following:

- Provision of accurate, timely and meaningful information to internal and external stakeholders
- Supporting creditable relationship with tax authorities based on trust, good faith and professionalism
- Constructive input to industry groups and international organizations on tax relevant topics
- Publication of our Group Tax Strategy and transparency on our tax positions (e.g. via publication of CbCR data)
- Promotion of tax transparency (e.g. member of B-Team, etc.) and participation in benchmark studies relating to tax transparency.

03 Our tax governance framework

Under German corporate law, Allianz SE is subject to the two-tier system consisting of a Board of Management and a Supervisory Board. The Board of Management is responsible for the management of the company, in particular for setting business objectives and the strategic direction, for coordinating and supervising the operating entities, and for implementing and overseeing an efficient risk management system. The Supervisory Board oversees and advises the Board of Management on managing the business. It is also responsible for appointing the members of the Board of Management, determining their overall remuneration, succession planning for the Board of Management, and reviewing Allianz SE's and the Allianz Group's annual financial statements. With respect to sustainability-related matters, including Allianz as a responsible taxpayer, the ultimate responsibility resides with the Board of Management of Allianz SE as the Group's parent company.

Our Group's Tax Strategy is embedded in Allianz tax governance framework. The Allianz Group Tax Strategy has been approved by the Allianz SE Board of Management. It is reviewed on an annual basis to ensure it aligns with Allianz Group strategy and values. The Audit Committee of the Supervisory Board has taken notice of the Group Tax Strategy. Any material amendment undergoes the described procedure accordingly. The Allianz Group Tax Strategy is effective from 01.12.2023 and published on our website (www.allianz.com).

The Tax Strategy is reflected in our Allianz Standard for Tax Management (the Standard) which represents the Allianz governance framework for tax management and sets minimum requirements for all tax-relevant processes, methods and structures. The Standard is applying across the entire Allianz Group to all our internal and outsourced tax processes and is effectively communicated and published. All Group entities have to adhere to the Standard when conducting their tax activities. Monitoring activities are performed by the Group tax function.

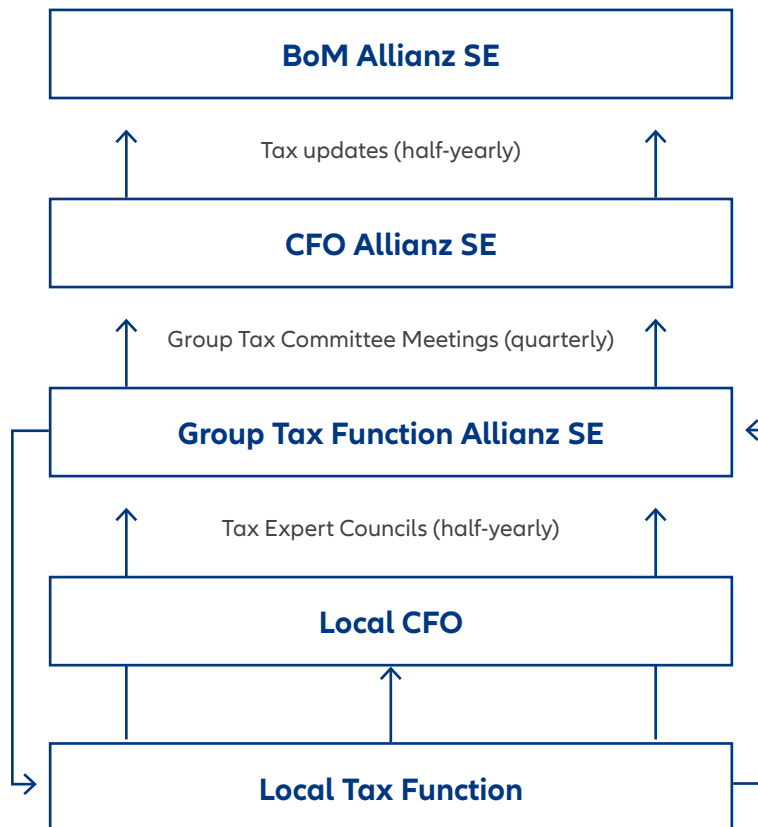
The Allianz Standard for Tax Management including any material changes needs approval by the Chief Financial Officer (CFO) of Allianz SE. The Board of Management of Allianz SE takes notice of the periodically reviewed Standard.

04 Our roles and responsibilities

Allianz Group tax function oversees compliance with the Group's Tax Strategy across the Group. The Group tax function is embedded in the finance division and therefore, the Group Head of Tax reports on a regular basis to the CFO of Allianz SE. The CFO regularly informs the Board of Management of Allianz SE on the Group's tax situation, the tax risk assessment as well as key strategic tax topics, including updates on tax developments. Additionally, tax issues that could have a significant impact on Allianz Group are presented to the Supervisory Board's Audit Committee by the CFO of Allianz SE. Regular updates on all material tax topics and their current and future impact on Allianz Group's financials are provided by the Group tax function to the CFO of Allianz SE inter alia via institutionalized Group Tax committee meetings taking place at least quarterly.

The local day-to-day responsibility for tax is upheld by our local tax functions that are hosted at the local finance functions. In key markets with business engagement of more than one Allianz entity, we install centralized local tax functions. Our Group tax function coordinates the local tax functions within the Group and focuses on tax matters that directly concern the Group as a whole. Regular country-specific and international tax expert councils facilitate the continuous interaction and coordination between the Group and our local tax functions. Together with standardized tax reporting procedures, this ensures that tax matters and local tax risks are assessed from a Group perspective and are appropriately reported to and overseen by the Group tax function.

Tax communication within the Group



Independent Practitioner's Report on a Limited Assurance Engagement on Allianz Group Tax Strategy

To Allianz SE, Munich

We have performed a limited assurance engagement on the determination of the qualitative disclosures in the "Allianz Group Tax Strategy" of Allianz SE, Munich (hereinafter "the Company"), with the effective date of 1 December 2023 (hereinafter the "Group Tax Strategy").

Responsibilities of the Executive Directors

The executive directors of the Company are responsible for the preparation of the Group Tax Strategy in accordance with the principles stated in the Sustainability Reporting Standards of the Global Reporting Initiative relevant for tax transparency reporting (hereinafter the "relevant GRI-Criteria").

This responsibility of Company's executive directors includes the selection and application of appropriate methods of tax transparency reporting as well as making assumptions and estimates related to individual tax transparency disclosures, which are reasonable in the circumstances. Furthermore, the executive directors are responsible for such internal controls as they have considered necessary to enable the preparation of a Group Tax Strategy that is free from material misstatement whether due to fraud or error.

Audit Firm's Independence and Quality Management

We have complied with the German professional provisions regarding independence as well as other ethical requirements.

Our audit firm applies the national legal requirements and professional standards – in particular the Professional Code for German Public Auditors and German Chartered Auditors ("Berufssatzung für Wirtschaftsprüfer und vereidigte Buchprüfer": "BS WP/vBP") as well as the Standard on Quality Management 1 published by the Institut der Wirtschaftsprüfer (Institute of Public Auditors in Germany; IDW): Requirements to quality management for audit firms (IDW Qualitätsmanagementstandard 1: Anforderungen an das Qualitätsmanagement in der Wirtschaftsprüferpraxis – IDW QMS 1 (09.2022)), which requires the audit firm to design, implement and operate a system of quality management that complies with the applicable legal requirements and professional standards.

Practitioner's Responsibility

Our responsibility is to express a limited assurance conclusion on the qualitative disclosures in the Group Tax Strategy based on the assurance engagement we have performed.

Within the scope of our engagement, we did not perform an audit on external sources of information or expert opinions, referred to in the Group Tax Strategy.

We conducted our assurance engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised): Assurance Engagements other than Audits or Reviews of Historical Financial Information, issued by the IAASB. This Standard requires that we plan and perform the assurance engagement to allow us to conclude with limited assurance that nothing has come to our attention that causes us to believe that the qualitative disclosures in the Company's Group Tax Strategy have not been prepared, in all material aspects, in accordance with the relevant GRI-Criteria.

Independent Practitioner’s Report on a Limited Assurance Engagement on Allianz Group Tax Strategy

In a limited assurance engagement, the assurance procedures are less in extent than for a reasonable assurance engagement and therefore a substantially lower level of assurance is obtained. The assurance procedures selected depend on the practitioner’s judgment.

Within the scope of our assurance engagement, we performed amongst others the following assurance procedures and further activities:

- Obtaining an understanding of the structure of the sustainability organization and of the stakeholder engagement
- Inquiries of personnel involved in the preparation of the Group Tax Strategy regarding the preparation process, the internal control system relating to this process and selected disclosures in the Group Tax Strategy
- Identification of the likely risks of material misstatement of the Group Tax Strategy under consideration of the relevant GRI-Criteria
- Evaluation whether the qualitative disclosures in Group Tax Strategy have been prepared in accordance with the relevant GRI-Criteria.
- Analytical evaluation of selected disclosures in the Group Tax Strategy
- Comparison of selected disclosures with corresponding data in the consolidated financial statements and in the group management report
- Evaluation of the presentation of the selected disclosures regarding tax transparency performance.

Assurance Conclusion

Based on the assurance procedures performed and assurance evidence obtained, nothing has come to our attention that causes us to believe that the qualitative disclosures in the Company’s Group Tax Strategy have not been prepared, in all material aspects, in accordance with the relevant GRI-Criteria.

Intended Use of the Assurance Report

We issue this report on the basis of the engagement agreed with the Company. The assurance engagement has been performed for purposes of the Company and the report is solely intended to inform the Company as to the results of the assurance engagement. The report is not intended to provide third parties with support in making (financial) decisions. Our responsibility lies solely toward the Company. We do not assume any responsibility towards third parties.

Munich, 05 March 2024

PricewaterhouseCoopers GmbH
Wirtschaftsprüfungsgesellschaft

Hendrik Fink
Wirtschaftsprüfer
(German Public Auditor)

Prof. Dr. Arne Schnitger
Steuerberater / CPA
(German Tax Advisor / Certified
Public Accountant)

