



# Going to work with comfort and confidence

Anti-harassment and discrimination guide

2023 Edition

# Going to work with comfort and confidence

**Our actions, words and behaviour matter.** Allianz Global Investors is committed to respecting and promoting the highest standard of ethics as well as fostering a diverse and inclusive culture. **AllianzGI's ambition is to offer equal opportunity to all Employees and to nurture a work environment free of Harassment, Discrimination, Bullying and other Abusive Conduct of any kind.**

Creating a Harassment and Discrimination-free work environment is everyone's responsibility. **All Employees should lead by example by demonstrating mutual respect and must not engage or participate in any harassing or**

**discriminatory behaviors.** It is AllianzGI's expectation that all employees and managers will take appropriate steps to prevent a Hostile Work Environment.

Our Global Anti-Harassment and Anti-Discrimination Policy ([see link](#)) is designed to ensure that all employees live up to their responsibility by describing fundamental principles and highlighting resources available to help employees understand and uphold the standards of conduct set forth in the policy. These standards are based on AllianzGI's values which form the foundations of expectations regarding the behavior of AllianzGI's employees.



This guide is a shorter version of our Global Anti-Harassment and Anti-Discrimination Policy ([see link](#)).

Please refer to it for more detailed information about AllianzGI's commitment to creating a Harassment and Discrimination-free work environment and for a list of Definitions and Examples of Prohibited Conduct.

# Creating a harassment and discrimination-free workplace

AllianzGI prohibits any act of discrimination and harassment based on sex, gender, gender identity, sexual orientation, race, age, creed, color, national origin, ancestry, religion, pregnancy,

disability, medical condition, veteran status, marital status, family status, parental status, any other protected characteristic, or any other consideration made unlawful by applicable law.

We can all prevent harassment and discrimination by:

**Refraining from actions that may offend or embarrass** others;

Remembering to **treat people as they wish to be treated** and not as you would like to be treated;

**Letting others know that you do not approve disrespectful behaviors**, such as offensive emails, inappropriate comments, derogatory cartoons and jokes;

**Participating in company learning opportunities** related to fostering a harassment and discrimination-free workplace environment.

# Setting the tone for a respectful work environment as a manager

**As a manager, you are encouraged to deal with incidents of harassment and discrimination at the onset.**

While some level of professional conflict or disagreement among peers is a normal part of working life from time to time, certain forms of behavior – such as **harassment, discrimination, bullying** or other **abusive conduct** – are never to be tolerated.

How can you **set the tone for a respectful work environment?**

**Lead by example** by modeling respectful behaviors and not tolerating disrespectful and inappropriate behavior;

**Monitor the atmosphere in their workplace and pay close attention to the tone of interactions and comments** made between employees and co-workers.

**Pay attention to the use of derogatory and other inappropriate language or jokes, and check for increased absenteeism or staff turnover.**

HR Business Partners, Employee Assistance Programs (EAP) and, where applicable, local Workers Councils can offer support to assist managers in responding to situations of conflict.

# How to deal with disrespectful behavior

If you experience, observe or suspect that conduct prohibited by our Global Anti-Harassment and Anti-Discrimination Policy ([see link](#)) has occurred, taking one or more of the following steps may be appropriate under the circumstances:

**Speak with the person about his/her behavior, if comfortable taking that step.** Sometimes, people do not realize the impact that their behaviour and actions have on others and **perception is key to determine if a particular statement or conduct could be considered Abusive Conduct.**

**If this is not successful in stopping the behavior, or if you are not comfortable speaking with the person involved, you can talk with your manager, or with the designated HR Business Partner.**

**You may contact AllianzGI's Employee Assistance Program (EAP) or, if applicable, the local Workers Council for advice.**

**You may also choose to pursue legal remedies with the assistance of governmental agencies or authorities.**

**Employees based in the US can also report the incident using AllianzGI's designated confidential reporting channels, as follows:**

- using the following hotline phone number: **+1 877 628 7486**
- through AllianzGI's reporting website at <https://allianzgispeakup.ethicspoint.com>

Complaints will be handled confidentially, to the extent possible and consistent with applicable legal requirements, AllianzGI's policies and the need to conduct a proper investigation.

AllianzGI will not tolerate retaliation against employees who participate in an internal or external investigation regarding an alleged violation of Global Anti-Harassment and Anti-Discrimination Policy ([see link](#)).

# Frequently asked questions

What can I do if I am not sure about how to file a complaint covered under the Global Anti-Harassment and Anti-Discrimination Policy ([see link](#)), or if I have questions generally about the content of the policy?

**If you are not sure if the situation that you are dealing with is covered under the policy, you are encouraged to consult your HR Business Partner.**

A co-worker has accused me of harassment because of a joke I made in a meeting. What should I do?

**If someone tells you that he/she is offended by your words or actions, you have the responsibility to listen to his/her point of view. What you and other people find humorous may be offensive to others. You should take your co-worker's statement seriously, apologize and stop the behavior immediately.**

In our monthly staff meetings, my co-worker frequently makes rude comments about my personal life and untrue, disparaging remarks about my work in front of the team. Is this bullying?

**These behaviors are not appropriate in any setting. Repeated behaviors that are intended to embarrass or intimidate are examples of workplace bullying. If you do not feel comfortable discussing this directly with your co-worker, speak with your manager, your HR Business Partners, Employee Assistance Programs (EAP) or, if applicable, local Workers Councils.**

I tried to speak with my co-workers about their inappropriate behavior but they said they were only joking and that I was being too sensitive. What should I do?

**If you feel offended, it does not matter if someone says "I was only joking". You have a right to ask them to stop and they have the responsibility to listen. If you need assistance, you may contact your HR Business Partners, Employee Assistance Programs (EAP) or, if applicable, local Workers Councils.**

What should I do if I witness workplace harassment or discrimination?

**If you are comfortable doing so, do let the person know that his/her behavior is inappropriate. You may choose to do this in private or consult with your manager, your HR Business Partners, Employee Assistance Programs (EAP) or, if applicable, local Workers Councils.**

What if the person harassing me is my manager?

**Employees have the right to be treated with respect in the workplace. If you are in this situation, speak with another manager or employee with higher level of authority or consult with your HR Business Partners, Employee Assistance Programs (EAP) or, if applicable, local Workers Councils.**

Will the person who harassed may be disciplined?

**If it is determined that an employee engaged in conduct prohibited by the Global Anti-Harassment and Anti-Discrimination Policy ([see link](#)), he/she may be disciplined. For confidentiality reasons, the person who made the complaint may not be informed of the nature of the disciplinary action.**

Is the process confidential?

Complaints raised under the Global Anti-Harassment and Anti-Discrimination Policy (see link) will be handled strictly confidentially, and consistent with applicable legal requirements, company policies and the need to conduct an adequate investigation or review. Only those employees who need to know to assist with the investigation will be informed.

For the avoidance of doubt, confidentiality is not the same thing as anonymity, and it is usually necessary for the person making the complaint to be identified and for some reasonable information to be shared when investigating the complaint.

What is the average length of an investigation?

There is no pre-determined length of a typical investigation as each investigation is entirely dependent on the unique facts and circumstances of each claim.

Who decides whether a complaint moves forward to an investigation?

All complaints will be thoroughly examined and reviewed by the Human Resources team, together with Legal (as required) in accordance with the principles set out in the Global Anti-Harassment and Anti-Discrimination Policy (see link) and the Global Investigations and Whistleblowing Procedure, who will come to the decision on whether the complaint is serious and credible so as to warrant a full detailed investigation.

How can I be sure that there will not be retaliation if I file a complaint?

AllianzGI will not tolerate retaliation or reprisals of any kind towards an employee who, in good faith reports a concern and/or a violation of the Global Anti-Harassment and Anti-Discrimination Policy (see link). If you file a complaint or cooperate in any investigation and feel that you are being retaliated against, you should report this as soon as possible to your HR Business Partner so that AllianzGI can take immediate action to address it.



What if a complaint is made against me?

AllianzGI is committed to reviewing all reported concerns, conducting proper, fair and thorough investigations tailored to the circumstances, and taking appropriate remedial and concluding steps as warranted. All action taken by AllianzGI in response to a concern will necessarily depend on the nature and severity of the concern. This may include initial inquiries and fact-gathering to decide whether an investigation is appropriate and, if so, the form and scope of the investigation. Note that an investigation into concerns raised is not an indication that they have either been confirmed or rejected. AllianzGI complies with law in conducting investigations, and AllianzGI expects that employees will cooperate with and provide truthful information to facilitate an effective investigation.

Is there a deadline to filing a complaint?

No, there is no deadline to filing a complaint; however, employees are encouraged to come forward and file a complaint as soon as possible after the alleged incident.

How does my workplace move forward after a complaint has been resolved?

The HR Business Partner can offer advice to managers and employees to help restore the workplace in the aftermath of a complaint. Managers are encouraged to reinforce the importance of being respectful in the workplace and having open communication. It may be necessary to re-establish how the group works together and the new ground rules. Managers should also continue to watch for the signs of ongoing or unresolved conflicts. In some cases, an external consultant may be contacted to assist with the workplace restoration efforts.

Should the people involved be separated in the workplace during an investigation?

This may be advisable or required in certain cases, but this will ultimately depend on the individual facts of the given complaint.

**Allianz Global Investors** is a leading active asset manager with over 600 investment professionals in over 20 offices worldwide and managing EUR 520 billion in assets. We invest for the long term and seek to generate value for clients every step of the way. We do this by being active – in how we partner with clients and anticipate their changing needs, and build solutions based on capabilities across public and private markets. Our focus on protecting and enhancing our clients' assets leads naturally to a commitment to sustainability to drive positive change. Our goal is to elevate the investment experience for clients, whatever their location or objectives.

## **Allianz Global Investors**

Data as at 30 June 2023. Total assets under management are assets or securities portfolios, valued at current market value, for which Allianz Asset Management companies are responsible vis-à-vis clients for providing discretionary investment management decisions and portfolio management, either directly or via a sub-advisor. This excludes assets for which Allianz Asset Management companies are primarily responsible for administrative services only. Assets under management are managed on behalf of third parties as well as on behalf of the Allianz Group.

To learn more about our continuing efforts to promote inclusion and diversity throughout our firm, visit <https://www.allianzgi.com/en/our-firm/inclusion-diversity>.

This material is being distributed by the following Allianz Global Investors companies: Allianz Global Investors U.S. LLC, an investment adviser registered with the U.S. Securities and Exchange Commission; Allianz Global Investors GmbH, an investment company in Germany, authorized by the German Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin); Allianz Global Investors Asia Pacific Ltd., licensed by the Hong Kong Securities and Futures Commission; Allianz Global Investors Singapore Ltd., regulated by the Monetary Authority of Singapore [Company Registration No. 199907169Z]; Allianz Global Investors Japan Co., Ltd., registered in Japan as a Financial Instruments Business Operator [Registered No. The Director of Kanto Local Finance Bureau (Financial Instruments Business Operator), No. 424, Member of Japan Investment Advisers Association]; and Allianz Global Investors Taiwan Ltd., licensed by Financial Supervisory Commission in Taiwan.