AXA Global Healthcare (UK) Limited

Slavery and Human Trafficking Statement

This statement is made by **AXA Global Healthcare (UK) Limited** ("**AGH**"), and its associated companies, pursuant to Section 54 of the UK Modern Slavery Act 2015 (the "**MSA**"). Having previously published a voluntary statement as evidence of AGH's commitment to combatting and preventing slavery and human trafficking within the organisation and its supply chains, this is the fifth annual statement made by AGH pursuant to the MSA, and it sets out the steps that the Company has taken during the 2024 financial year to combat and prevent all forms of modern slavery and human trafficking in their businesses and supply chains. This statement covers the Company's direct operations and supply chains.

The AXA Group ("**AXA**") has a long history of adhering to and promoting strong professional ethics and is committed to conducting its business according to the highest standards of honesty and fairness. This commitment to observing such ethical standards is designed not only to ensure compliance with applicable laws and regulations in the various jurisdictions where AXA operates but also to earning and keeping the continued trust of its clients, shareholders, personnel and business partners. AXA believes that its success and reputation is not only dependant on the quality of its products and the services provided to its clients, but also on the way it does business. This includes a strong commitment to human rights and therefore, it welcomes the transparency promoted by the MSA.

1 Company's structure and business

AGH is part of the AXA Group, a worldwide leader in financial services. As at the date of this Statement, AGH employs approximately 350 employees in the UK. AGH is an intermediary supporting the distribution, administration and coordination of international private medical insurance activities dedicated to individuals as well as SME, mid-market and large corporate entities. AGH distributes directly to customers or via brokers. The product offer includes a range of health and well-being services.

2 Company's supply chains

The Company is a major purchaser of products and services for the purpose of its internal operations. Its supply chains are the networks of third-party entities directly or indirectly supporting its organisation in the production, distribution and ongoing communication of its products and services to the end customer.

3 Engagements and policies in relation to modern slavery and human trafficking

The AXA Group is committed to respecting internationally recognized human rights principles as defined by the United Nations Universal Declaration of Human Rights, the core standards of the International Labour Organisation and the Guiding Principles for the implementation of the United Nations "Protect, Respect and Remedy" Framework (Ruggie Principles). The AXA Group is also committed to applying international general and sector-specific standards such as the UN Principles for Responsible Investment, the UN Principles for Sustainable Insurance and the UN Global Compact ("**UN GC**"). Since 2003, AXA adheres to the UN GC and has formally committed to promoting its ten guiding principles, including those on human rights (such as avoiding complicity in human rights abuses and supporting and respecting the protection of internationally proclaimed human rights)

and labour standards (such as supporting the elimination of all forms of forced and compulsory labour and the effective abolition of child labour).

In addition, the AXA Group has put in place policies to support its commitment to ethical business practices across the organisation. These include:

- **The AXA Group Human Rights Policy**, which aims to ensure that (i) the Group does not cause or contribute to adverse human rights impacts and (ii) such impacts are addressed when they occur. The policy also sets out AXA's commitment to identify, prevent and/or mitigate adverse indirect human rights impacts that are linked to its operations or services, through its business relationships or projects it has invested in or insured.

- **The AXA Group Compliance and Ethics Guide** (the 'Guide'), which establishes guiding principles and Group-wide policies designed to ensure that all AXA Group companies and their personnel have a common vision of the Group's ethical standards (including the UN GC principles on human rights, labour standards, environment and anti-corruption) and operate in accordance with those standards. All AXA employees are encouraged to report promptly any practices, actions or conduct that they believe are inappropriate or inconsistent with any of the policies set out in the Guide through their local whistleblowing procedures. Senior officers of AXA entities are asked to submit an annual certification to confirm that they comply with all the provisions set out in the Guide.

.The AXA Group Human Rights Policy, the Guide and the principles and standards mentioned above all apply to AGH. The senior officers of AGH all complied with the annual certification process in relation to the Guide in 2024 and were asked to ensure their teams were aware of the Guide and its contents. In addition, AGH also adheres to the AGH Whistleblowing Policy, which details how employees can raise concerns where they believe there may be wrong-doing or improper conduct by senior managers, other employees, suppliers or contractors. This policy is overseen by the AGH Whistleblowers' Champion, Ian Johnson, Non-Executive Director of AGH.

4 Management of the modern slavery and human trafficking risk in the Company's operations

AXA acknowledges its responsibility to respect human rights in its operations and conducts its business in compliance with applicable employment regulations in the jurisdictions in which it operates. The Guide sets out protections for AXA's employees and their rights, in particular, it emphasises that:

- AXA is committed to upholding the right of freedom of association and collective bargaining, as well as maintaining constructive labour management relations in every country in which it does business, and to doing so with due respect for different national approaches to social dialogue;

- AXA respects the rights of its employees to enjoy just and favourable conditions of work, including health and safety protections, and is committed to providing adequate information and training on health and safety and wellbeing issues.

In addition, AXA promotes diversity and inclusion by prohibiting any form of discrimination between current, past or prospective staff on diversity dimensions including age, disability, gender identity, ethnicity or race, sexual orientation, marital status or religion through its Diversity and Equal Opportunities Policy. Within AGH, there is a Diversity and Inclusion Executive Sponsor and Leader, who works closely with The Diversity and Inclusion Lead at AXA UK to provide regular updates to stakeholders.

5 Assessment of AGH's largest suppliers and due diligence process in relation to AGH's supply chains

AGH ensures that it works with suppliers that meet the AXA standards with respect to ethics and sustainability through a clearly documented process for supplier selection and contracting.

In accordance with such process, AGH's standard contractual terms with suppliers include specific reference to AXA's sustainability requirements, and suppliers are required to provide a formal commitment to uphold the core standards of the UN GC by signing AXA's "Sustainability clause". Notably, the suppliers agree to refrain from using, or accepting that their own suppliers and sub-contractors make use of, child labour (under 15 years old) or forced labour.

Detection of a direct or indirect violation by the supplier of the AXA sustainability requirements is discussed directly with the supplier with a view to establishing a mutually agreed and documented corrective action plan. Where any issue is not resolved satisfactorily, AGH reserve the contractual right to end their relationship with the relevant supplier.

In addition, AGH has the ability to seek to prevent or mitigate adverse human rights impact of certain of their suppliers by the use of an independent third party to assess a number of sustainability topics, including child and forced labour. This process assists AGH to detect the supply chain sustainability risks in respect of those suppliers. AXA UK plc's procurement team can provide access to training and materials in support of the assessment process.

The Board of Directors of AXA Global Healthcare (UK) Limited approved this statement on 2 June 2025 which constitutes AGH's slavery and human trafficking statement for the financial year ending 2024.

By 

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AXA Global Healthcare (UK) Limited