AXA Services Limited

Slavery and Human Trafficking Statement

This statement is made by AXA Services Limited ("**AXA Services**") and its associated companies, and is reflective of the practices of AXA UK plc, AXA Insurance UK plc, AXA PPP Healthcare Limited and AXA PPP Healthcare Group Limited (together, the "**Companies**"), pursuant to Section 54 of the UK Modern Slavery Act 2015 (the "**MSA**"). This is the sixth annual statement made by AXA Services pursuant to the MSA since it came into force and it sets out the steps that the Companies have taken during the 2021 financial year to combat and prevent all forms of modern slavery and human trafficking in their businesses and supply chains. This statement covers the Companies' direct operations and supply chains.

The AXA Group 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.

Companies' structure and business

The Companies are part of the AXA Group, a worldwide leader in financial services. As at the date of this Statement, the Companies employ approximately 7800 employees in the UK. During the financial year 2021, AXA UK plc, through its subsidiaries (and their associated companies), specialised in:

- **Insurance** – AXA Insurance UK plc and its associated companies provide personal and commercial insurance products for home, motor and travel customers, direct to the customer as well as servicing the SME, mid-market and corporate sectors. They also offer their products via brokers, aggregators and in conjunction with corporate and retail partners.
- **Healthcare** – AXA PPP Healthcare Limited and its associated companies, including AXA PPP Healthcare Group Limited, provide private medical insurance cover direct to the customer as well as to the SME, mid-market and large corporate sectors, via agents, brokers, aggregators and in conjunction with corporate partners. They also offer a range of health and well-being services to the corporate sector.

Companies' supply chains

The Companies are major purchasers of products and services for the purpose of their internal operations. Their supply chains are the networks of third party entities directly or indirectly supporting their organisations in the production, distribution and ongoing communication of their products and services to the end customer.

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**[1], 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**")[2], 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 the Companies. The senior officers of the Companies all complied with the annual certification process in relation to the Guide in 2021 and were asked to ensure their teams were aware of the Guide and its contents. In addition, the Companies also adhere to the AXA UK 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 AXA UK Whistleblowers' Champion, Kari Hale, Non-Executive Director and UK Audit Committee Chairman of AXA UK.

Management of the modern slavery and human trafficking risk in the Companies' 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 AXA

[1] *Available on www.axa.com.*

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UK, there is a Diversity and Inclusion Board, headed by the Diversity and Inclusion Executive Sponsor and Leader. The Diversity and Inclusion Board provides leadership to AXA UK's approach and progress on diversity and inclusion and provides regular updates to stakeholders including the UK&I Board and Management Committee.

Assessment of the Companies' largest suppliers and due diligence process in relation to the Companies' supply chains

The Companies ensure that they work with suppliers that meet the AXA standards with respect to ethics and corporate responsibility through a clearly documented process for supplier selection and contracting.

In accordance with such process, the Companies' standard contractual terms with suppliers include specific reference to AXA's corporate responsibility requirements, and suppliers are required to provide a formal commitment to uphold the core standards of the UN GC by signing AXA's "Corporate Responsibility 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 corporate responsibility 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, the Companies reserve the contractual right to end their relationship with the relevant supplier.

In addition, AXA Services' procurement teams 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 corporate responsibility topics, including child and forced labour. This process assists AXA Services to detect the supply chain corporate responsibility 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 Services Limited approved this statement on 22 June 2022 which constitutes the Companies' joint slavery and human trafficking statement for the financial year ending 2021.

By 

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