

Slavery and Human Trafficking Statement

This statement is made by AXA Group Operations UK Limited on behalf of themselves and is reflective of the practices, pursuant to Section 54 of the UK Modern Slavery Act 2015 (the “**MSA**”). It sets out the steps that the company has taken during the 2024 financial year to combat and prevent modern slavery and human trafficking in their Direct Suppliers. This statement covers the Companies’ direct operations and Direct suppliers, “suppliers and subcontractors” mean the Group’s direct suppliers and subcontractors for its procurement activities.

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.

1 Companies’ structure and business

AXA Group Operations UK Limited Previously named AXA Technology UK Services Ltd was created on January 1st, 2002, and is a wholly owned subsidiary of the AXA Group, a worldwide leader in financial services. AXA Group Operations UK Limited currently employ approximately 200 employees in the UK. During the financial year 2024, AXA Group Operations provided IT infrastructure services and support for the UK Operating companies (including AXA Insurance and AXA PPP Healthcare). Note that AXA Group Operations is a worldwide operation, and since its inception in 2002 has expanded and now serves 51 AXA Group companies in 22 countries, managing over €1 billion in IT expenditure and employs approximately 2,800 staff.

2 Companies’ supply chains

AXA Group Operations UK Limited are purchasers of products and services for the purpose of their internal operations in order to deliver infrastructure services and support to AXA Operating companies as aforementioned. AXA Group Operations UK Limited’s supply chain is a group of suppliers and subcontractors. “Suppliers and subcontractors” mean the Group’s direct suppliers and subcontractors for its procurement activities.”

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, The AXA Group 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 The AXA Group'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 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 Group 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 2023 and were asked to ensure their teams were aware of the Guide and its contents. In addition, the Company also adheres to the AXA Group Operations 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. The policy is overseen by AXA Group Operations Head of Internal Audit, Mathieu Perrin.

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

The AXA Group 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 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;
- The 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,

¹ Available on www.axa.com.

² Available on www.axa.com.

ethnicity or race, sexual orientation, marital status or religion through its Diversity and Equal Opportunities Policy.

5 Assessment of The AXA Group Companies largest suppliers and due diligence process in relation to the AXA Group Companies' supply chains.

The Company aims to work with suppliers that meet the AXA Group standards with respect to ethics and sustainability requirements through a clearly documented process for supplier selection and contracting.

In accordance with such process, The AXA Group Companies standard contractual terms with suppliers include specific reference to The AXA Group's sustainability requirements, and suppliers are required to provide a formal commitment to uphold the core standards of the UN GC. Notably, the suppliers agree to refrain from using, or accepting that their own suppliers and sub-contractors make use of, child labour or forced labour.

Detection of a direct or indirect violation by a supplier of The AXA Group's sustainability requirements is discussed directly with the supplier with a view to establishing a mutually agreed and documented corrective action plan.

In addition, the AXA Group Operations Procurement team 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 enables AXA Group Operations to detect ESG risks in respect of those suppliers.

The Board of Directors of AXA Group Operations UK Limited approved this statement on 21 March 2024, which constitutes AXA Group Operations UK Limited slavery and human trafficking statement for the financial year ending 2024.

By



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