AXA UK Modern Slavery Statement 2025

This is AXA UK's tenth annual Modern Slavery Statement. It is made in accordance with section 54 of the UK Modern Slavery Act 2015 (the "**Act"**) and covers the financial year ending 2025. The statement is made on behalf of AXA UK plc, AXA Insurance UK plc, AXA PPP healthcare Limited, AXA Services Limited, AXA Health Services Limited and AXA PPP Healthcare Group Limited (together, the "**Companies**" and part of the AXA Group). This statement covers the Companies' direct operations and supply chains.

Modern slavery is a fundamental violation of human rights. We have zero tolerance for these practices in any part of our business or supply chain. AXA's purpose is to act for human progress by protecting what matters. What matters has always included the communities we live in and work with across the globe. We are committed to protecting people, supporting our communities and working responsibly with all our partners, and we welcome the transparency promoted by the Act.

AXA has a long history of promoting human rights and responsible business practices. We support international standards such as the UN Guiding Principles on Business and Human Rights, the International Labour Organisation's conventions and the UN Global Compact, which AXA Group has been a signatory to since 2003. This statement sets out the steps we have taken in 2025 to reduce the risk of modern slavery in our operations and supply chains, and our plans to continue strengthening our approach.

At a glance
We are committed ensuring there is no place for modern slavery in our business or supply chain. In 2025 we:

- Strengthened our supplier checks to reduce risks of forced or child labour.
- Continued to train our people so they know how to spot and report concerns.
- Supported international standards on human rights and responsible business.

We know there is always more to do. In 2025 we have built on this work by deepening supplier engagement, enhancing our risk assessments, and increasing transparency in how we report progress.

1. Reporting Companies' Structure and Business

AXA UK is part of the AXA Group, one of the world's leading insurance and asset management companies. In the UK, we employ around 8,500 people. Our business is organised into three main areas:

- **General Insurance** - AXA Insurance UK plc and its associated companies provide personal and commercial insurance products for home and motor 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 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.

2. Reporting Companies' Supply Chains

Our supply chain is wide-ranging and supports the delivery of these products and services. It includes thousands of suppliers providing IT, professional services, facilities management, property services, health services and claims-related services such as repair and replacement of goods.

Behind every service we deliver is a network of suppliers we rely on.

AXA UK's supply chains include suppliers of IT and communications, data, property, facilities management, office equipment and supplies, catering, marketing services and professional services such as legal, auditing, banking and personnel recruitment. These suppliers range from global strategic partners to local service providers who play a vital role in helping us serve our customers.

We recognise that some suppliers, particularly those providing manual or outsourced services, may present higher risks of labour exploitation. That is why we set clear standards for all our suppliers and monitor compliance with our requirements.

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

We are committed to respecting human rights and making sure modern slavery has no place in our business or supply chain. Our approach is shaped by international standards, including the UN Guiding Principles on Business and Human Rights, the International Labour Organisation's core conventions, and the UN Global Compact, which AXA has supported since 2003.

To put these commitments into practice, we have a number of policies and codes that guide how we work:

- **AXA Group Human Rights Policy** – (updated in 2026) which is based on an assessment AXA uses to identify the human rights that could be impacted by the business activities of insurance companies (i.e. insurance, investment, own operations) and to define priority areas for human rights due diligence at AXA. The policy aims at preventing human rights abuses and reflects AXA's adherence to the general and sectoral international standards mentioned above. The Policy sets up AXA's approach to human rights with respect to its different activities: as a responsible company (as an employer and as a business partner), insurer and investor.
- **AXA Group Compliance and Ethics Guide** – (updated in 2024) which applies to all employees and subsidiaries worldwide establishes guiding principles to treat its customers fairly and professionally by being honest and accountable when promoting products and services. Senior Officers at AXA UK are required to submit an annual certification confirming that they comply with the Guide, and they ensure their teams are aware of its contents. Employees are encouraged to raise any concerns through local whistleblowing channels if they believe behaviours fall short of the standards in the Guide.
- **AXA Group Vigilance Plan** (the "**Vigilance Plan**"), adopted by AXA S.A. to comply with the requirements of the French "*devoir de vigilance*" law, sets out the reasonable vigilance measures established and implemented by AXA to identify risks and prevent serious violations to human rights and fundamental freedoms, health and safety of individuals and the environment resulting from AXA's activities and those of the

companies it controls, directly or indirectly, as well as from the activities of subcontractors or suppliers with which AXA entities have an established business relationship, when these activities are related to this relationship. The Vigilance Plan describes AXA's existing system of internal control and risk management which includes a number of tools and procedures implemented within AXA to support enforcement of AXA standards and policies in operating entities and compliance with applicable regulations and describes AXA's procurement processes. The monitoring of the implementation of vigilance measures and assessing their effectiveness, is carried out, at a high level, by AXA's system of internal controls and in addition, AXA relies on a self-assessment reporting process for certain AXA entities. For more information on procurement processes and the gaps identified by the self-assessment conducted in 2025, please refer to the Vigilance Plan set out at Section 4.7 of the 2024 AXA Universal Registration Document (URD)[1] .

- **AXA UK Whistleblowing Policy** - allows employees to raise concerns confidentially, including any concerns about modern slavery. This is overseen by our Whistleblowers' Champion, Kari Hale, Non-Executive Director and Chair of the AXA UK Audit Committee.

The AXA Group Human Rights Policy, the Guide and the principles and standards mentioned above all apply to the Companies. These policies are more than documents – they shape how we expect our people and partners to act every day. For example, suppliers must agree to our Sustainability Clause, which explicitly prohibits the use of child or forced labour.

These commitments reflect our belief that protecting our communities is everyone's responsibility – from the way our employees act, to the standards we set for our suppliers.

4. Management of the modern slavery and human trafficking risk in our supply chain

We know that some areas of our business and supply chain carry higher risks of modern slavery than others. These risks are most likely where work is outsourced or where services involve manual labour - for example cleaning, catering, security or facilities management.

As part of the updated Sustainability Procurement Guidelines introduced in 2024, AXA UK must carry out risk assessments across all IT, General Expenses and Insurance Procurement contracts. These assessments categorise suppliers as high, medium or low risk, depending on the type of contract, the country where services are provided, and how suppliers recruit and manage their workforce.

Our supply chain plays a vital role in helping us deliver for our customers, and we want to work with partners who share our values. The AXA Group Sustainability Clause is mandatory in all supplier contracts and requires suppliers to respect human rights, including a clear prohibition on the use of child labour and forced labour. In accordance with the above process, the Companies' applicable standard contractual terms with suppliers include specific reference to AXA's sustainability requirements and appropriate provisions are included requiring suppliers to comply with applicable laws and regulations, including applicable human rights and modern slavery legislation. Any material challenges by the supplier to the standard wording is reviewed by AXA UK's Procurement Team and other subject matter experts to consider how best to ensure the supplier has appropriate controls in place.

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[1] AXA Universal Registration Document 2024

For higher-risk suppliers with significant spend, we use independent third-party reviews through EcoVadis. These assessments review labour standards, human rights, and wider ESG performance. Any detection of a direct or indirect violation by the supplier of the AXA sustainability requirements would be 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 standard AXA UK provision includes a right to end its relationship with the supplier.

We also introduced an ESG scorecard in mid-2024. This is used during supplier selection processes (RFPs) to evaluate environmental, social and governance performance alongside price and service. The scorecard gives greater weighting to ESG results for higher-risk suppliers, ensuring sustainability and human rights standards are a core part of procurement decisions.

In 2025 we strengthened our risk assessment processes by:

- Embedding weighted ESG questions into all of our RFP processes and taking the additional step to ensure all existing claims suppliers assessed as material or medium materiality to complete an EcoVardis assessment by the end of Q1 2026.
- Requiring 100% of AXA UK Procurement team members to sign our Code of Ethics, which covers confidentiality, fairness, objectivity and transparency.
- Including AXA's Sustainability Clause in 99.7% of all GenX and IT contracts, enhancing our engagement with suppliers on a wider range of sustainability topics.

5. Due diligence in our own operations

Our approach to managing human rights risks within AXA UK is guided by the AXA Group Compliance and Ethics Guide, which sets out the principles we expect all employees to follow. This includes acting with integrity, respecting people's rights, and creating a safe and fair workplace.

In practice, this means:

- **Freedom of association** – employees have the right to join a union, to collective bargaining and to open, constructive dialogue with management.
- **Fair working conditions** – we comply with all employment regulations, ensuring just and favourable terms of work, including health and safety protections. We provide training and information so that employees understand and can manage health, safety and wellbeing risks.
- **Diversity and inclusion** – through our Diversity and Equal Opportunities Policy, we prohibit discrimination of any kind. Our Diversity and Inclusion Board, led by senior sponsors, oversees our progress and reports regularly to the AXA UK & Ireland Board and Management Committee.

We are committed to applying the same high standards to third-party staff working on our sites as to our own employees, ensuring they are treated fairly and in line with our values. All of our third-party recruitment providers on our Preferred Supplier List are contractually required to align their practices to internationally recognised standards such as the UN Universal Declaration of Human Rights, the International Labour Organisation's core standards (including conventions on child labour, forced labour, and non-discrimination), the UN Guiding Principles on Business and Human Rights, the UN Global Compact, and the OECD Guidelines for Multinational Enterprises.

6. KPIs and future plans

We measure our progress through clear indicators that show how we are managing risks and driving improvements. In 2025 our key measures included:

- Percentage of all AXA UK general expenditure and IT contracts signed in 2025 including AXA's Sustainability Clause: 99.7%
- Percentage of general expenditure and IT procurement processes including an ESG scorecard review: 100% of eligible suppliers
- Percentage of AXA UK Procurement team members signed our Code of Ethics, covering confidentiality, fairness, objectivity and transparency: 100%
- Number of AXA UK general expenditure and IT suppliers identified as high-risk in human rights areas in 2025: 1 out of 37 eligible GenEX and IT suppliers (~3% of the total spend of AXA UK within those categories). A remediation action plan was launched and successfully completed, resulting in a reassessment above AXA standards.
- Number of remediation plans, due to non-compliance, launched across general expenditure and IT suppliers of the Companies: 1 remediation action plan launched in 2025 and successfully completed, following recommendations to focus on high and medium priority actions, resulting in a reassessment above AXA standards.

Looking ahead, we plan to build on our work by:

- Continuing to embed sustainability and human rights considerations even further into supplier selection and management.
- Strengthening awareness and capability across our teams through continued awareness building and guidance.

This statement has been approved by the Boards of AXA UK plc and AXA Insurance UK plc on 23 June 2026 and constitutes their slavery and human trafficking statement for the financial year ending 31 December 2025.

Signed,

Tara Foley
Chief Executive Officer and Director
AXA UK plc and AXA Insurance UK plc