

## Slavery and Human Trafficking Statement

This statement is made by **AXA Corporate Solutions Assurance** (the "**Company**") 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 2017 financial year to combat and prevent all forms of modern slavery and human trafficking in its business and supply chains. This statement covers the Company's 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 dependent 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

The AXA Group provides insurance and asset management solutions around the world and operates four business segments: Life & Savings, Property & Casualty, Asset Management and Banking. The Company belongs to the Property and Casualty segment and it is the AXA Group entity specializing in Property & Casualty, Marine, Aviation and Space insurance solutions for large multinationals. The Company is headquartered in Paris but employs 1,500 people, based in 16 international offices, serving corporate clients, wherever they are in the world, offering protection, prevention, and innovative solutions and services.

### 2 Company's supply chains

The Company is a purchaser of products and services for the purpose of its internal office based operations. The Company therefore has a limited supply chain that is restricted to services and products purchased from sectors generally considered as having a low risk of modern slavery and human trafficking. Nevertheless, the following sections set out how we are committed to ethical business practices within our supply chain.

### 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**<sup>1</sup>, 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")<sup>2</sup>, 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. Seniors 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 Company.

#### **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 potential staff on the basis of age, race, nationality, ethnic origin, gender, sexual orientation, religion, marital status or disability. Within the Company, a Diversity and Inclusion Executive Sponsor and Leader has been appointed and is in charge of documenting the Company's diversity and inclusion plan. Such plan is to be submitted to the Group Human Resources annually with an assessment of the accomplishments, issues and needs arising.

<sup>1</sup> Available on [www.axa.com](http://www.axa.com).

<sup>2</sup> Available on [www.axa.com](http://www.axa.com).



## **Assessment of the Company's largest suppliers and due diligence process in relation to the Company's supply chains**

The Company outsources the selection and the contract management for some of its largest suppliers, in the more significant countries, to the procurement department of the local AXA entities or of the AXA Group. A key benefit of this choice to outsource internally rather than externally is to ensure that the AXA Group's standards on ethical business practices would be respected.

The AXA Group's standards include the specific reference of AXA's corporate responsibility requirements in its contractual terms with suppliers, and the requirement of suppliers 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.

Where the Company detects a direct or indirect violation by the supplier of the AXA Group requirements relating to corporate responsibility, the violation 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 Company reserves the contractual right to end its relationship with the relevant supplier.

In order to reinforce the commitment of the Company to the AXA corporate responsibility requirements, a clearly documented process for all supplier selection and contracting was defined by the Company headquarters in 2017 with respect to outsourcing. Guidelines on this process have been shared with all branches and subsidiaries of the Company, acting as guidance for local implementation who have leveraged partnerships with other AXA entities in the jurisdiction of the branch or subsidiary. The focus of the improvements will be to ensure uniform outsourcing selection and contract management, including closer monitoring of the relationship with suppliers during the next financial year.

### **6 Training and information available to staff**

In the future, the Company plans to roll-out an awareness training programme for procurement employees to give them a detailed knowledge of AXA's corporate responsibility principles. This training programme will highlight the instrumental role of responsible procurement in order to ensure that AXA engages with responsible suppliers.

The Company's Board of Directors approved this statement on 15 June 2018, which constitutes the Company's slavery and human trafficking statement for the financial year ending 2017.

By

**Rob Brown**

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