



2020 Report Human Rights Risk Assessment

July 2020



Human Rights Risk Mapping














List of relevant Human Rights (1/2)

This table shows the outcome of the analysis and presents the most relevant Human Rights for AXA by activity considering the associated risks

Human right	Direct influence		Indirect influence	
	Employees	Insurance	Supply Chain	Investment
Right of equality before the law and to non-discrimination of minorities	✓	✓	✓	✓
Right to be free from all forms of forced or compulsory labour	✓	✓	✓	✓
Right of protection for the child			✓	✓
Right to freedom of association, collective bargaining and join trade unions and right to strike	✓		✓	✓
Right to freedom of thoughts, conscience, religion, opinion, information and expression			✓	✓
Right to work and right to enjoy just and favourable conditions of work	✓	✓	✓	✓

List of relevant Human Rights (2/2)

This table shows the outcome of the analysis and presents the most relevant Human Rights for AXA by activity considering the associated risks

Human right	Direct influence		Indirect influence	
	Employees	Insurance	Supply Chain	Investment
Right to life, liberty and security of the person				
Right to health, to social security (social insurance) and an adequate standard of living				
Right to privacy				
Right to own property				
Right to access to effective remedies				
Right to freedom of movement				

Main Human Risks (1/2)

2016 vs. 2019 analysis

EMPLOYEES	
Main Human Rights risks 2016	Main Human Rights risks 2019
1. Rights of equality before the law, non-discrimination (of minorities)	1. Right to freedom of movement
2. Right to be free from all forms of forced or compulsory labour	2. Rights of equality before the law, non-discrimination (of minorities)
3. Rights to freedom of association, collective bargaining and join trade unions and right to strike	3. Right to be free from all forms of forced or compulsory labour
4. Right to health, to social security (social insurance) and an adequate standard of living	4. Right to freedom of thoughts, conscience, religion, opinion, information and expression
5. Right to enjoy just and favourable conditions of work	5. Rights to freedom of association and collective bargaining

INSURANCE	
Main Human Rights risks 2016	Main Human Rights risks 2019
1. Rights of equality before the law, non-discrimination (of minorities)	1. Right to freedom of movement
2. Right to be free from all forms of forced or compulsory labour	2. Rights of equality before the law, non-discrimination (of minorities)
3. Rights to freedom of association, collective bargaining and join trade unions and right to strike	3. Right to be free from all forms of forced or compulsory labour
4. Right to health, to social security (social insurance) and an adequate standard of living	4. Right to freedom of thoughts, conscience, religion, opinion, information and expression
5. Right to enjoy just and favourable conditions of work	5. Rights to freedom of association and collective bargaining

Main Human Risks (2/2)

2016 vs. 2019 analysis


INVESTMENT	
Main Human Rights risks 2016	Main Human Rights risks 2019
1. Rights of equality before the law, non-discrimination (of minorities)	1. Right to freedom of movement
2. Right to be free from all forms of forced or compulsory labour	2. Right to freedom of thoughts, conscience, religion, opinion, information and expression
3. Right to enjoy just and favourable conditions of work	3. Rights of equality before the law, non-discrimination (of minorities)
4. Right to freedom of association and collective bargaining	4. Right to be free from all forms of forced or compulsory labour
5. Right to health, to social security (social insurance) and an adequate standard of living	5. Right to enjoy just and favourable conditions of work



Mitigation measures in place

Mitigation measures analysis (1/12)


The objective is to identify how AXA ensures that Human Rights are respected, and violations are addressed in the sectors and countries where it has employees, customers and more generally partners through its investment and procurement activities. For that purpose the analysis was conducted through an independent third party to understand the policies, processes and management systems currently in place covering direct and indirect impacts on activities in each region in scope

Risk	Scope	MITIGATION MEASURES			
		Employees	Insurance	Investment	Supply chain
Right of equality before the law and to nondiscrimination of minorities 	Group	<ul style="list-style-type: none"> Employment handbooks and policies (flexible working, grievance and complaints procedures). Group Diversity & Inclusion policy Global antiharassment, discrimination policy (due for release in June 2020). Group Operational Risk Grid AXA Gender Balance 	<ul style="list-style-type: none"> Corporate Responsibility Business related business bans ESG analysis by AXA (country restriction) and by Sustainability regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> AXA's Center of Excellence for Responsible Investing AXA Group Investment's restrictions on investing in certain securities ESG analysis by AXA (country restriction) and by Sustainability regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> Corporate Responsibility Clause CR Assessments (labour & Human Rights section of Ecovadis scoring) Responsible procurement awareness training Group procurement Risk Matrix Reputation questionnaire of the Group Vendor Risk Framework Code of Ethics for procurement associates
	AXA China	<ul style="list-style-type: none"> Notification on the Insurance of 2020 internal recruitment regulation for AXA TP Property & Casualty Insurance 	-	<ul style="list-style-type: none"> Group policy applies 	-
	AXA XL	<ul style="list-style-type: none"> Group policy applies Local antiharassment and discrimination policies. Code of Conduct, AXA XL code supplement and local Employee Handbooks. Antiharassment and discrimination training. Grievances and complaints policies. Whistleblowing speakup hotline. Dedicated HR/Legal Resources. 	<ul style="list-style-type: none"> In the US compliance with the Magnitsky and Global Magnitsky Acts 	<ul style="list-style-type: none"> Group policy applies 	<ul style="list-style-type: none"> Compliance with UK Modern Slavery Act/Statement

Mitigation measures analysis (2/12)

Risk	Scope	MITIGATION MEASURES			
		Employees	Insurance	Investment	Supply chain
Right to be free from all forms of forced or compulsory labour E C I S	Group	<ul style="list-style-type: none"> Employment handbooks and policies (flexible working, grievance and complaints procedures). Group Diversity & Inclusion policy 	<ul style="list-style-type: none"> AXA Group Policy on investments in and underwriting of tar sand/ oil sands Corporate Responsibility Business related business bans ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> AXA's Center of Excellence for Responsible Investing AXA Group Investment's restrictions on investing in certain securities AXA Group Policy on investments in and underwriting of tar sand/ oil sands AXA Group Policy on investments in palm oil production, agricultural land, timberland and forestry ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> Corporate Responsibility Clause CR Assessments (labour & Human Rights section of Ecovadis scoring) Responsible procurement awareness training Group procurement Risk Matrix
	AXA China	-	-	<ul style="list-style-type: none"> Group policy applies 	-
	AXA XL	<ul style="list-style-type: none"> Compliance with UK Human Rights/Anti slavery statement 	-	<ul style="list-style-type: none"> Group policy applies 	<ul style="list-style-type: none"> Compliance with UK Modern Slavery Act/Statement


Mitigation measures analysis (3/12)

Risk	Scope	MITIGATION MEASURES			
		Employees	Insurance	Investment	Supply chain
Right of protection for the child 	Group	-	<ul style="list-style-type: none"> Corporate Responsibility Business related business bans ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> AXA's Center of Excellence for Responsible Investing AXA Group Investment's restrictions on investing in certain securities ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) AXA Group Responsible Investment policy AXA Group Policy on Controversial Weapons AXA Group Policy on investments in palm oil production, agricultural land, timberland and forestry 	<ul style="list-style-type: none"> Corporate Responsibility Clause CR Assessments (labour & Human Rights section of Ecovadis scoring) Responsible procurement awareness training Group procurement Risk Matrix
	AXA China	-	-	<ul style="list-style-type: none"> Group policy applies 	-
	AXA XL	<ul style="list-style-type: none"> Compliance with UK Human Rights/Anti slavery statement 	<ul style="list-style-type: none"> In the US compliance with the Magnitsky and Global Magnitsky Acts 	<ul style="list-style-type: none"> Group policy applies 	<ul style="list-style-type: none"> Compliance with UK Modern Slavery Act/Statement


Mitigation measures analysis (4/12)

Risk	Scope	MITIGATION MEASURES			
		Employees	Insurance	Investment	Supply chain
Rights to freedom of association, collective bargaining and join trade unions and right to strike E I S	Group	<ul style="list-style-type: none"> Employment handbooks and policies (flexible working, grievance and complaints procedures). EWC for AXA Group Employee representative bodies in other jurisdictions. 	<ul style="list-style-type: none"> AXA Group Policy on investments in and underwriting of tar sand/ oil sands ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> AXA's Center of Excellence for Responsible Investing AXA Group Investment's restrictions on investing in certain securities ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) AXA Group Policy on investments in and underwriting of tar sand/ oil sands 	<ul style="list-style-type: none"> Group procurement Risk Matrix CR Assessments (labour & Human Rights section of Ecovadis scoring) Responsible procurement awareness training
	AXA China	-	-	<ul style="list-style-type: none"> Group policy applies 	-
	AXA XL	<ul style="list-style-type: none"> EWC for AXA Group applied to AXA XL Compliance with UK Human Rights/Anti slavery statement 	<ul style="list-style-type: none"> In the US compliance with the Magnitsky and Global Magnitsky Acts 	<ul style="list-style-type: none"> Group policy applies 	<ul style="list-style-type: none"> Compliance with UK Modern Slavery Act/Statement

Mitigation measures analysis (5/12)

Risk	Scope	MITIGATION MEASURES			
		Employees	Insurance	Investment	Supply chain
Right to freedom of thoughts, conscience, religion, opinion, information and expression 	Group	<ul style="list-style-type: none"> Group Diversity & Inclusion policy Global antiharassment, discrimination policy (due for release in June 2020). 	<ul style="list-style-type: none"> ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> AXA's Center of Excellence for Responsible Investing AXA Group Investment's restrictions on investing in certain securities ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> Corporate Responsibility Clause CR Assessments (labour & Human Rights section of Ecovadis scoring) Responsible procurement awareness training Group procurement Risk Matrix
	AXA China	<ul style="list-style-type: none"> Notification on the Insurance of 2020 internal recruitment regulation for AXA TP Property & Casualty Insurance 	-	<ul style="list-style-type: none"> Group policy applies 	-
	AXA XL	<ul style="list-style-type: none"> Group policy applies Local antiharassment and discrimination policies. Code of Conduct, AXA XL code supplement and local Employee Handbooks. Antiharassment and discrimination training. Grievances and complaints policies. Whistleblowing speak up hotline. Dedicated HR/Legal Resources. 	<ul style="list-style-type: none"> In the US compliance with the Magnitsky and Global Magnitsky Acts 	<ul style="list-style-type: none"> Group policy applies 	<ul style="list-style-type: none"> Compliance with UK Modern Slavery Act/Statement

Mitigation measures analysis (6/12)

Risk	Scope	MITIGATION MEASURES			
		Employees	Insurance	Investment	Supply chain
Right to work and right to enjoy just and favourable conditions of work 	Group	<ul style="list-style-type: none"> Group Diversity & Inclusion policy The ILO Global Business & Disability Network Charter Employment handbooks and policies (flexible working, grievance and complaints procedures), Code of Conduct (anti-harassment, discrimination and retaliation and whistleblowing), Group Operational Risk Grid AXA Gender balance AXA Group Remuneration Policy AXA Health & safety management manual 	<ul style="list-style-type: none"> AXA Group Policy on investments in and underwriting of tar sand/ oil sands ESG analysis by AXA (country restriction) and by Sustainability regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> AXA's Center of Excellence for Responsible Investing AXA Group Investment's restrictions on investing in certain securities ESG analysis by AXA (country restriction) and by Sustainability regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) AXA Group Responsible Investment policy AXA Group Policy on investments in and underwriting of tar sand/ oil sands AXA Group Policy on investments in palm oil production, agricultural land, timberland and forestry 	<ul style="list-style-type: none"> Corporate Responsibility Clause CR Assessments (labour & Human Rights section of Ecovadis scoring) Responsible procurement awareness training Group procurement Risk Matrix Reputation questionnaire of the Group Vendor Risk Framework
	AXA China	<ul style="list-style-type: none"> AXA Health & safety management manual 	-	<ul style="list-style-type: none"> Group policy applies 	-
	AXA XL	-	<ul style="list-style-type: none"> In the US compliance with the Magnitsky and Global Magnitsky Acts 	<ul style="list-style-type: none"> Group policy applies 	-

Mitigation measures analysis (7/12)

Risk	Scope	MITIGATION MEASURES			
		Employees	Insurance	Investment	Supply chain
Rights to life, liberty and security of the person E I	Group	<ul style="list-style-type: none"> AXA Health & safety management manual Employment handbooks and policies including flexible working, grievance and complaints procedures. Code of Conduct including antiharassment, discrimination and retaliation and whistleblowing. 	<ul style="list-style-type: none"> EU Blocking Statute Council Regulation (EC) No 2271/96 Commission Delegated Regulation (EU) 2018/1100 ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> AXA's Center of Excellence for Responsible Investing AXA Group Investment's restrictions on investing in certain securities ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) AXA Group Responsible Investment policy AXA Group Policy on Controversial Weapons 	<ul style="list-style-type: none"> Corporate Responsibility Clause CR Assessments (labour & Human Rights section of Ecovadis scoring) Responsible procurement awareness training
	AXA China	<ul style="list-style-type: none"> AXA Health & safety management manual 	-	<ul style="list-style-type: none"> Group policy applies 	-
	AXA XL	<ul style="list-style-type: none"> Group policy applies 	<ul style="list-style-type: none"> In the US compliance with the Magnitsky and Global Magnitsky Acts AXA XL Sanctions and Arms Watchlist Sanctions clauses in (re)insurance contracts Compliance with AXA XL Supplement 	<ul style="list-style-type: none"> Group policy applies 	<ul style="list-style-type: none"> Compliance with UK Modern Slavery Act/Statement Compliance with UN sanctions for broker

Mitigation measures analysis (8/12)


Risk	Scope	MITIGATION MEASURES			
		Employees	Insurance	Investment	Supply chain
Rights to health, to social security (social insurance) and an adequate standard of living E C I S	Group	<ul style="list-style-type: none"> AXA Health & safety management manual 	<ul style="list-style-type: none"> ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) AXA Group Policy on investments in and underwriting of tar sand/ oil sands AXA Group Policy on the Tobacco Industry Corporate Responsibility Business related business bans 	<ul style="list-style-type: none"> AXA's Center of Excellence for Responsible Investing AXA Group Investment's restrictions on investing in certain securities ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) AXA's new Climate strategy AXA Group Responsible Investment policy AXA Group Policy on Controversial Weapons AXA Group Policy on investments in and underwriting of tar sand/ oil sands AXA Group Policy on derivate investments in food ("soft") commodities AXA Group Policy on the Tobacco Industry 	<ul style="list-style-type: none"> Corporate Responsibility Clause CR Assessments (labour & Human Rights section of Ecovadis scoring) Responsible procurement awareness training Group procurement Risk Matrix
	AXA China	<ul style="list-style-type: none"> Group policy applies 	-	<ul style="list-style-type: none"> Group policy applies 	-
	AXA XL	<ul style="list-style-type: none"> AXA XL provide excellent health benefits, including access to private health insurance, permanent health insurance, dental insurance in certain jurisdictions. AXA XL observe and comply with minimum wages levels in the jurisdictions in which we operate. 	<ul style="list-style-type: none"> In the US compliance with the Magnitsky and Global Magnitsky Acts 	<ul style="list-style-type: none"> Group policy applies 	<ul style="list-style-type: none"> Compliance with UK Modern Slavery Act/Statement

Mitigation measures analysis (9/12)

Risk	Scope	MITIGATION MEASURES			
		Employees	Insurance	Investment	Supply chain
Right to privacy E C	Group	<ul style="list-style-type: none"> Compliance with data privacy requirements as applicable to employees and their personal data AXA Group Binding Corporate rules Group Operational Risk Grid AXA Gender Balance Data privacy impact assessment 	<ul style="list-style-type: none"> ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> Corporate Responsibility Clause Code of Ethics for procurement associates
	AXA China	-	-	-	-
	AXA XL	-	<ul style="list-style-type: none"> In the US compliance with the Magnitsky and Global Magnitsky Acts 	<ul style="list-style-type: none"> Compliance with UK Human Rights Act/Statement 	
Right to own property I	Group	-	<ul style="list-style-type: none"> Compliance with UN sanctions EU Blocking Statute Council Regulation (EC) No 2271/96 Commission Delegated Regulation (EU) 2018/1100 ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> AXA Group Responsible Investment policy AXA Group Policy on investments in palm oil production, agricultural land, timberland and forestry ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> Corporate Responsibility Clause
	AXA China	-	-	<ul style="list-style-type: none"> Group policy applies 	-
	AXA XL	-	<ul style="list-style-type: none"> In the US compliance with the Magnitsky and Global Magnitsky Acts AXA XL Sanctions and Arms Watchlist Sanctions clauses in (re)insurance contracts 	<ul style="list-style-type: none"> Group policy applies 	<ul style="list-style-type: none"> Compliance with UN sanctions for broker Compliance with UK Modern Slavery Act/Statement

Risk identified for: E Employees C Insurance activities I Investment activities S Supply chain

Mitigation measures analysis (10/12)

Risk	Scope	MITIGATION MEASURES			
		Employees	Insurance	Investment	Supply chain
Right to own property 	Group	-	<ul style="list-style-type: none"> Compliance with UN sanctions EU Blocking Statute Council Regulation (EC) No 2271/96 Commission Delegated Regulation (EU) 2018/1100 ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> AXA Group Responsible Investment policy AXA Group Policy on investments in palm oil production, agricultural land, timberland and forestry ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> Corporate Responsibility Clause
	AXA China	-	-	<ul style="list-style-type: none"> Group policy applies 	-
	AXA XL	-	<ul style="list-style-type: none"> In the US compliance with the Magnitsky and Global Magnitsky Acts AXA XL Sanctions and Arms Watchlist Sanctions clauses in (re)insurance contracts 	<ul style="list-style-type: none"> Group policy applies 	<ul style="list-style-type: none"> Compliance with UN sanctions for broker Compliance with UK Modern Slavery Act/Statement

Mitigation measures analysis (11/12)

Risk	Scope	MITIGATION MEASURES			
		Employees	Insurance	Investment	Supply chain
Right to access to effective remedies E	Group	<ul style="list-style-type: none"> Code of Conduct, antiharassment and discrimination policies, grievance and disciplinary processes, whistleblowing policies. Compliance with fair processes, investigations and remedies as required by local employment legislation . 	ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company))	<ul style="list-style-type: none"> AXA's Center of Excellence for Responsible Investing AXA Group Investment's restrictions on investing in certain securities ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> Corporate Responsibility Clause
	AXA China	-	-	<ul style="list-style-type: none"> Group policy applies 	-
	AXA XL	-	<ul style="list-style-type: none"> In the US compliance with the Magnitsky and Global Magnitsky Acts 	<ul style="list-style-type: none"> Group policy applies 	<ul style="list-style-type: none"> Compliance with UK Modern Slavery Act/Statement

Mitigation measures analysis (12/12)

Risk	Scope	MITIGATION MEASURES			
		Employees	Insurance	Investment	Supply chain
Right to freedom of movement E I S	Group	<ul style="list-style-type: none"> AXA Social dialogue and mobility 	<ul style="list-style-type: none"> Compliance with UN sanctions EU Blocking Statute Council Regulation (EC) No 2271/96 Commission Delegated Regulation (EU) 2018/1100 ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> AXA's Center of Excellence for Responsible Investing AXA Group Investment's restrictions on investing in certain securities ESG analysis by AXA (country restriction) and by Sustainalytics regarding UNGC Principles (Five risk levels : negligible, low, medium, high (review by an internal AXA committee to decide on exclusion or exemption of the company) and severe (excluded company)) 	<ul style="list-style-type: none"> Corporate Responsibility Clause
	AXA China	<ul style="list-style-type: none"> Social dialogue and mobility 	-	<ul style="list-style-type: none"> Group policy applies 	-
	AXA XL	-	<ul style="list-style-type: none"> In the US compliance with the Magnitsky and Global Magnitsky Acts AXA XL Sanctions and Arms Watchlist Sanctions clauses in (re)insurance contracts 	<ul style="list-style-type: none"> Group policy applies 	<ul style="list-style-type: none"> Compliance with UN sanctions for broker Compliance with UK Modern Slavery Act/Statement



Appendix

List of Human Rights (1/2)

Human right	Definition	Relevant business activity where the risk could occur	Example of impact area (illustrative)
Right to life	The right to life entails the right not to be deprived of life arbitrarily or unlawfully, and the right to have one's life protected. The right not to have one's life taken away by arbitrary killing is a fundamental right and includes a duty on governments to investigate such killings and punish offenders.	Investment	- Investment in arms industry (controversial weapons) or in mining industry (conflict minerals)
Right to liberty and security	The rights to liberty and security of person prohibit unlawful or arbitrary detention of any kind. 'Arbitrary' (or unreasonable) detention is prohibited even if authorised under a state's domestic laws. This Article recognizes the right to security of people, whether in or out of detention. This part of the Article has the greatest potential relevance for companies. Security of the person encompasses protection from physical attacks, threats of physical attack, or other severe instances of harassment.	Investment Employees	- Investment in industries with child labour - Protection of own employees in countries with security threats
Right not to be subjected to slavery, servitude or forced labour	Slavery occurs when one human being effectively owns another. The right to freedom from servitude covers other forms of dominance, e.g. religious economic exploitation, and degradation of human beings, which might arise for example in the context of the trafficking of workers (including sex workers), serfdom and debt bondage. Given the extreme nature of these Human Rights abuses, the rights to freedom from slavery and servitude are subject to no restrictions or qualifications. Forced or compulsory labour is also prohibited, and is defined by the International Labour Organization (ILO) as 'all work or service which is exacted from any person under menace of any penalty and for which the said person has not offered himself voluntarily.'	Investment Insurance Employees Supply Chain	- Investment in mining or agricultural sector (i.e. cocoa and palm production in risk countries) - Insurance of corporate customers with risks of forced labour in their operations - Contracts with suppliers with risks of forced labour with their employees
Right to equality before the law, equal protection of the law, non-discrimination (of minorities, migrant labour, third-party contracted labour)	This right guarantees equality before the law, and the equal protection of the law without discrimination. Individuals should be protected from discrimination on different grounds including race, colour, sex, language, religion, political or other opinion, national or social origin, property, and birth or other status. The latter ground is open-ended and has been interpreted to include statuses such as health status (e.g. HIV/AIDS), disability, marital status, age and sexual orientation. Discrimination means any distinction, exclusion or preference made on one or more of the grounds listed above that has the effect of reducing or removing altogether equality of opportunity or treatment for the victim.	Insurance Employees Supply Chain	- Non-discrimination of clients insurance - Non-discrimination of own employees - Non-discrimination of suppliers/subcontractors
Right to access to effective remedies	This right, and in particular, Article 2 of the ICCPR contains the general obligations for a State to respect and ensure that all individuals within its territory, and subject to its jurisdiction, enjoy the rights recognised in the Convention without discrimination; it also underscores the right to provision of an effective remedy for victims.	Employees	- Support from company in case of violation of one's rights
Right to privacy	This right protects people against arbitrary, unreasonable or unlawful interference with their privacy, family, home or correspondence, as well as attack on their honour and reputation. 'Arbitrary' or unreasonable restrictions on privacy are prohibited even if authorized under a State's domestic laws. Governments have duties to protect against interferences with privacy by State agents or private bodies such as employers and the media.	Insurance Employees	- Data privacy of customers - Data privacy of employees
Right to freedom of movement	This right has four parts. It allows people who are lawfully in a country to move freely throughout the country, to choose where to live within the country, and to leave the country. These three parts of the right may be limited by restrictions on movement that are necessary to protect national security, public order, public health or morals, or the rights and freedoms of others. The right to freedom of movement also gives people the right not to be arbitrarily prevented from entering their own country.	Investment Supply chain Employees	- Investments or purchase of products (textile or electronics) which have been made in certain countries, where workers are sometimes not allowed to leave the factory (e.g. Bangladesh)
Right of protection for the child	Children are recognized by this right as being in need of special protection as required by their status as minors. States Parties recognize the right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development.	Investment Supply chain	- Investment in sectors with high risk of child labour such as agriculture - Purchase of products (e.g. goodies) from companies where children might work
Right of minorities	This right recognizes the rights of members of ethnic, religious or linguistic minorities to enjoy their own culture, to practise their religion, and to speak their language. Indigenous peoples are included within the protection of Article 27 of the ICCPR. Their interests may also be protected under Article 1 (the right to self-determination) of both International Covenants (ICCPR and ICESCR). Article 27 also applies to migrants, including recently arrived migrants.	Insurance Investment Employees Supply Chain	- Non-discrimination of minorities within company (employee relations) - Non-discrimination of minorities through insurance and investment business

List of Human Rights (1/2)

Human right	Definition	Relevant business activity where the risk could occur	Example of impact area (illustrative)
Right to own property	The right to property ensures that everyone is entitled to own property alone as well as in association with others. No one shall be arbitrarily deprived of his property.	Investment	- Investments in agriculture, mining or real estate sector in developing countries with risk of expulsion of local communities from their land
Right to freedom of thought, conscience and religion	The right to freedom of thought, conscience, and religion encompasses a person's freedom to choose, practise and observe his or her chosen religion or belief. The freedom also protects atheists and the right not to profess any religion or belief. The right to manifest a religion or belief includes the right to worship, as well as to teach and observe rituals such as the wearing of particular clothes or headwear.	Employees Supply chain	- Rights of own employees - Rights of suppliers/sub-contractors and their employees
Right to freedom of opinion, information and expression	Article 19 protects the right of each person to hold opinions free from outside interference. This right cannot be restricted in any circumstances. Article 19 also protects the right to freedom of expression, which is the right to seek, receive and impart ideas in whatever media or form. This right can be restricted by measures provided by law and necessary to protect the rights or reputations of others, or to protect national security, public order, public health or morals.	Employees Supply chain	- Rights of own employees - Rights of suppliers/sub-contractors and their employees
Right to freedom of association	Article 22 of the ICCPR protects the right to form or join all types of association such as political parties, religious societies, sporting and other recreational clubs, non-governmental organisations and trade unions.	Investment Employees Supply chain	- Investment in countries where trade union rights are violated - Work together with companies where trade union rights are violated - Rights of own employees to protest
Right to social security, including social insurance	The right to social security encompasses the right to access and maintain benefits without discrimination. Governments are obliged to make available a system of social security. Such systems may involve contributory or insurance-based schemes, which normally entail compulsory contributions from the beneficiary and the beneficiary's employer (and sometimes the State), as well as universal or targeted schemes funded out of the public purpose. The right is essential in combating poverty, given its redistributive character; its realisation can, for example, have a significant impact on the enjoyment of other related rights, such as the right to an adequate standard of living and the right to health.	Insurance Employees Supply chain	- Provision of different insurance products fostering social security - Rights of own employees to have a social security - Contracts with suppliers/sub-contractors not providing social insurance
Right to work	The right to work recognises the right of everyone to the opportunity to make their living by work which they freely choose or accept. This implies that one should not be forced to engage in employment and that States develop a system designed to guarantee all workers access to employment. Workers should not be unfairly deprived of employment. Work as specified in Article 6 of the ICESCR must be "decent work", that is work that respects a person's Human Rights including workers' rights regarding conditions of remuneration and work safety. The right to work includes the prohibition of arbitrary dismissal.	Investment Employees	- Investments in different sectors - Rights of own employees
Right to enjoy just and favourable conditions of work (including rest and leisure)	The right to enjoy just and favourable working conditions has various components, which are all highly relevant to the actions of companies as they concern the treatment of employees. Companies can have a significant impact on the enjoyment of the various rights in Article 7 of the ICESCR in their capacity as employers.	Investment Employees	- Investments in different sectors - Rights of own employees
Right to form and join trade unions and the right to strike	Article 8 of the ICESCR concerns the right of everyone to form trade unions and to join the trade union of his or her choice, subject to the union's own membership rules. This right may only be restricted by States in circumstances that are set down in law and are necessary to protect national security, public order, or the rights and freedoms of others.	Investment Employees Supply chain	- Investment in countries where trade union rights are violated - Rights of own employees to join/form trade unions - Work together with companies where trade union rights are violated
Right to an adequate standard of living	Article 11 of the ICESCR guarantees the right to an adequate standard of living including adequate food, clothing, housing and continuous improvement of living conditions. It has also been interpreted as including access to sufficient water and sanitation.	Investment Insurance Employees	- Different insurance products limiting or mitigating the impact of negative events on people's living standard - Work with companies not allowing their employees to get an adequate standard of living - Investment in some sectors that will prevent people from getting an adequate standard of living
Right to health	This right recognises the highest attainable standard of physical and mental health. States must take measures to prevent, treat and control diseases, reduce infant mortality and provide for the healthy development of children, improve all aspects of industrial and environmental hygiene, and to create conditions that will ensure universal access to appropriate medical services and medical attention in the event of sickness.	Insurance Employees	- Provision of health insurance protecting people's physical and mental health - Provision of a health policy within own employees

Key Sources

The following key sources have been used in the Human Rights risk assessment:

- ShareAction (2020) (<https://shareaction.org/the-worlds-largest-asset-managers-pay-lip-service-to-preventing-human-rights-abuse/>)
- Global Witness (2020) (<https://www.globalwitness.org/en/campaigns/forests/bending-the-truth/>)
- People Under Threat (2019) (<https://peoplesunderthreat.org/>)
- UN Global Compact (2019) (<https://www.unglobalcompact.org/what-is-gc/mission/principles/principle-1>)
- Les Amis de la Terre France (2019) (<https://www.amisdela terre.org/sortie-du-charbon-AXA-impose-de-nouveau-son-leadership-en-matiere-climatique/>)
- State of California Department of Justice (2019) (<https://oag.ca.gov/privacy/ccpa>)
- International Conference of Data Protection & Privacy Commissioners (2019) (https://edps.europa.eu/sites/edp/files/publication/resolution-on-privacy-as-a-fundamental-human-right-2019-final_en.pdf)
- United Nations Human Rights - Sexual and reproductive health and rights (2018) (<https://www.ohchr.org/en/issues/women/wrgs/pages/healthrights.aspx>)
- Global Slavery Index (2018) (<https://www.globalslaveryindex.org/2018/data/maps/#prevalence>)
- Coalition for Human Rights in Development (2017) (<https://rightsinddevelopment.org/news/un-report-calls-on-development-banks-to-address-attacks-on-human-rights-defenders/>)
- Institute for Human Rights and Business (2017) (<https://www.publications.parliament.uk/pa/jt201617/jtselect/jtrights/443/44302.htm>)
- Maplecroft 2016 Human Rights Risk Index (<https://www.maplecroft.com/risk-indices/human-rights-risk/>)
- UNEP Finance Initiative: Human Rights Guidance Tool for the Financial Sector (<http://www.unepfi.org/humanrightstoolkit/sectors.php>)
- International Finance Corporation: FIRST for Sustainability (<http://firstforsustainability.org/risk-management/understanding-environmental-and-social-risk/risk-by-industry-sector/>)
- International Labour Organization (<http://www.ilo.org/global/lang-en/index.htm>)
- AXA publications and internal material, among others: AXA Full year 2019 earnings