March 2020

AXA Group Responsible Investment Policy

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Responsible Investment at AXA

AXA Group (AXA) is a long-term global investor with a duty to act in the best interests of its policyholders, shareholders and other stakeholders. AXA has developed a comprehensive policy that sets out AXA's position and beliefs on Responsible Investment (RI). Moreover, the objective is to align investments with AXA's Corporate Responsibility strategy.

1. Definition of Responsible Investment

We define RI as the integration of Environmental, Social, and Governance (ESG) considerations into our investment processes, including ownership practices. AXA believes that ESG factors have the potential over time to impact investment portfolios across companies, sectors, regions and asset classes. We believe that ESG issues can therefore affect risk and returns and as such require monitoring.

Within ESG, climate change deserves special attention. We actively pursue measures to manage climate-related risks and opportunities.

This policy is focused on high-level principles, as AXA is an asset owner with delegated asset management functions. We require our internal asset managers to follow these principles.

Sustainability-Related Memberships and Partnerships

As a signatory of the UN Principles for Responsible Investment we act according to the internationally recognized principles for sustainable finance.

AXA actively supports various initiatives related to climate change, ESG and sustainability including United Nations Global Compact, Principles for Sustainable Insurance, the Climate Finance Leadership Initiative and the Net Zero Asset Owner Alliance. Moreover, we work in partnership with non-governmental organizations on sustainability-related topics. AXA has also joined or supported many investor and insurance-led coalitions, including the Institutional Investors Group on Climate Change, the Montreal Carbon Pledge, and Science Based Targets. Such collaborative initiatives enable us to work with other investors to understand the impacts of environmental and social considerations on financial performance.

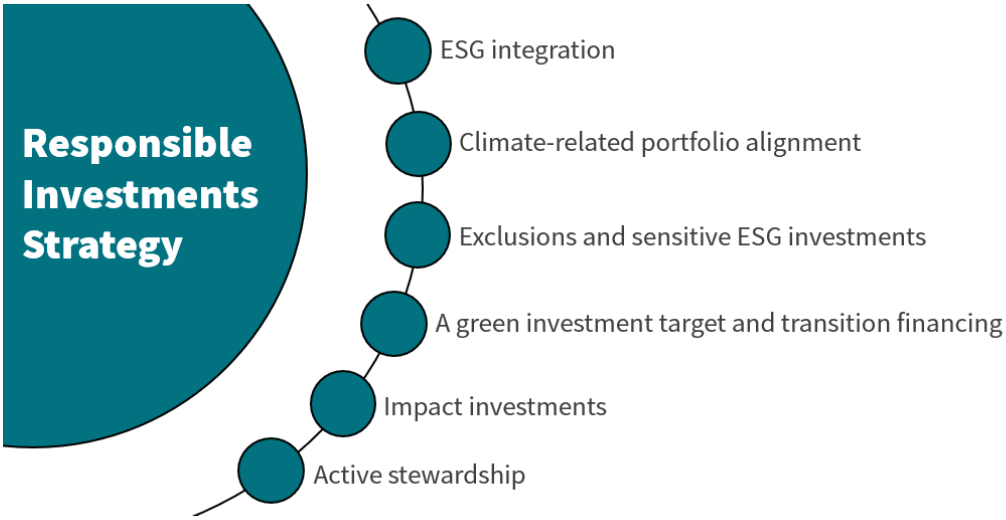
Policy Scope

This policy relates to AXA's activities as an asset owner. By this, we mean the decisions we make and activities that we undertake when we invest our assets.

AXA's assets are managed under the supervision of the Group's local Chief Investment Officers (CIOs) mainly by our in-house investment management company AXA Investment Managers, and for unit-linked holdings mostly by our multi-manager investment firm Architas, with the remainder being delegated to non-Group asset managers. This policy is relevant for all involved investment managers when managing assets on behalf of AXA Group.

This policy covers all of AXA's General Account insurance assets, i.e. the proprietary assets of the Group's insurance subsidiaries including the invested premiums paid by policyholders. The application to pension funds is restricted in selected jurisdictions where regulatory investment requirements overrule this policy. This policy also applies to unit-linked investments, where relevant.

Responsible Investment Strategy



AXA's RI strategy is based on the following pillars:

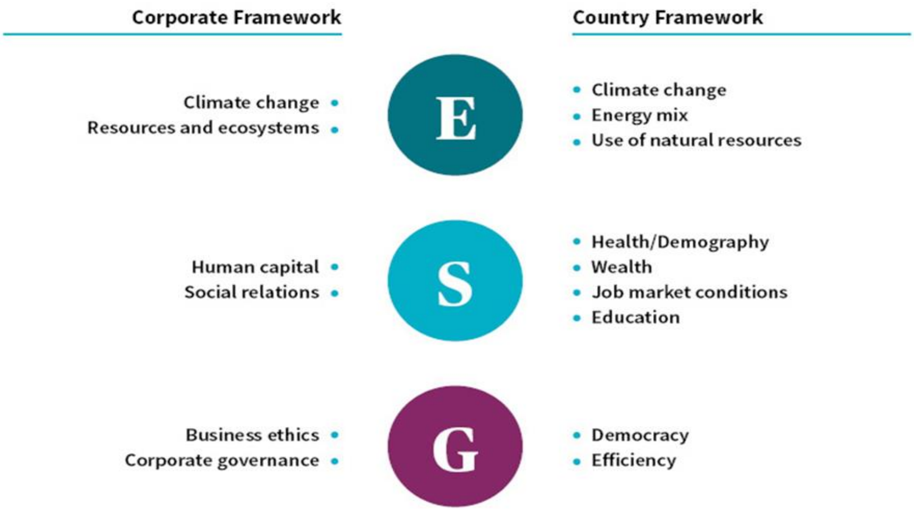
- ESG Integration. We integrate ESG analysis into investment processes, using KPIs and qualitative research across most of our assets. This includes the implementation of ESG "minimum standards" rules based on ESG and controversy scores to review and potentially exclude underperforming issuers from AXA's portfolios. Moreover, ESG considerations as well as the transparency of the issuers are integrated in the internal credit risk analysis.
- Climate-related portfolio alignment. Carbon metrics are integrated into investment decisions. We are also developing metrics for measuring the climate-related impact of our investments, in particular the contribution of our investments to the objective of the COP21 ("Paris Agreement") to limit global warming.
- Exclusions and sensitive ESG investments. Sector-based restrictions apply to sectors or companies that face acute social, human rights, ethical or environmental challenges. These currently include controversial weapons, coal mining and coal-based power generation, tar oil sands and associated pipelines, palm oil, food commodity derivatives, and tobacco.
- A green investment target and transition financing to increase the allocation of green assets across various asset classes and to support companies shifting towards less carbon-intensive business models.
- Impact investments that create intentional, positive, measurable and sustainable impacts on society while simultaneously delivering financial market returns.
- Active stewardship through voting and engagement on a range of ESG or sustainability issues.

Each of these are discussed in more detail below.

1. ESG Integration

We combine fundamental, quantitative and qualitative analysis whenever ESG-related portfolio decisions are made. In particular, ESG scores are complemented by qualitative ESG analysis and reports, fed by information collected from the external expert sources.

In the unit-linked business a qualitative ESG-related process for the selection of fund managers is in place. The details are available on www.architas.com.



The ambition is to score all asset classes. A proprietary methodology is in place to compute ESG scores for the main asset classes: equity issuers, debt of corporate issuers, debt of sovereign issuers and real assets (direct property, commercial real estate loans and infrastructure debt). For other asset classes the ESG assessment is based to a large degree on the results of the questionnaires of the issuers.

These ESG scores include an adjustment for controversies, being the issuers' involvement in ESG-related incidents. Severe involvement in controversial incidents is tracked regardless of the overall ESG score.

We have implemented a policy of ESG minimum standards to leverage our proprietary ESG scoring and to manage ESG risks and promote best practices. We actively screen companies with poor ESG performance: investments in issuers with the ESG score below a certain threshold or high controversy are to be avoided.

A low ESG score might not fully reflect the ESG situation of an issuer at a point in time and that is why a "comply or explain" approach is in place. In this case we rely on a qualitative analysis by our portfolio managers, supported by ESG analysts, which is overseen by the ESG Footprint Committee.

2. Climate-related portfolio alignment

AXA puts a special emphasis on the impact of our investments on climate change. AXA has committed to contain the "warming potential" of its investments to 1.5°C by 2050.

We are developing metrics for measuring that impact, in particular the contribution of our investments to the objective of the COP21 ("Paris Agreement") to limit global warming. The existing methodologies and metrics will evolve and require improvements over time.

In addition to quantifying the impact of our investments on climate change, we might divest parts of the portfolio (coal, oil sands) or exclude whole sectors to effectively pursue climate-related objectives.

3. Exclusions and sensitive ESG investments

We recognize that some social, societal, environmental or more general ethical issues are particularly sensitive and require a cautious approach. Certain activities and products could be inconsistent with AXA's corporate responsibility goals of protecting people over the long term and may be detrimental to AXA's brand and reputation.

In this context, AXA has over time developed specific sector guidelines and business restrictions that seek to address those issues. Currently these are:

- Coal mining and coal-based energy production
- Oil sands production and oil sands-related pipelines
- Tobacco manufacturing
- Palm oil production
- Food ("soft") commodities derivatives
- Controversial weapons manufacturing

Our most current sector guidelines are available on the AXA Group RI website https://www.axa.com/en/page/responsible-investment

Investment restrictions are based on sector-level blacklists and apply on a company name basis. Depending on the instrument and sector, new investments may be prohibited, or all relevant exposure may be required to be divested immediately.

Investment restrictions do not apply to index-based vehicles and investments in open funds.

4. Green investment target and transition financing

To actively increase the allocation to green assets AXA regularly sets itself an ambitious green investment target. The selection of green investments is based on proprietary analysis and encompasses various asset classes, currently green bonds, infrastructure investments, real estate and impact investments targeting positive environmental impacts. Some assets are externally labelled "green", for instance by the Climate Bonds Initiative, the rest qualify as such according to our own definitions that are in line with the broad market approach.

Moreover, AXA actively pursues financing of the planet's transition to the low-carbon economy by engaging in transition financing to support companies shifting towards less carbon-intensive business models.

5. Impact investments

We allocate capital to impact investments that are creating intentional, positive, measurable and sustainable impacts on society while simultaneously delivering financial market returns. Our investments address key environmental and social challenges and are aligned with the UN Sustainable Development Goals (SDG).

6. Active stewardship

Our ESG and climate integration, divestments and green investments strategy is complemented by an active engagement strategy. As a shareholder and a bondholder, we engage with the management of companies in which we invest in order to encourage high standards of corporate governance as well as good management of environmental and social risks. We hold constructive and challenging discussions directly with companies individually, and as part of a coalition of investors.

Voting at General Meetings is performed in favor of environmental, climate-related, social and governance issues including sustainability disclosures. Proxy voting is carried out by our asset managers. AXA IM's Corporate Governance and Voting Policy is found here: https://www.axa-im.com/en/stewardship.

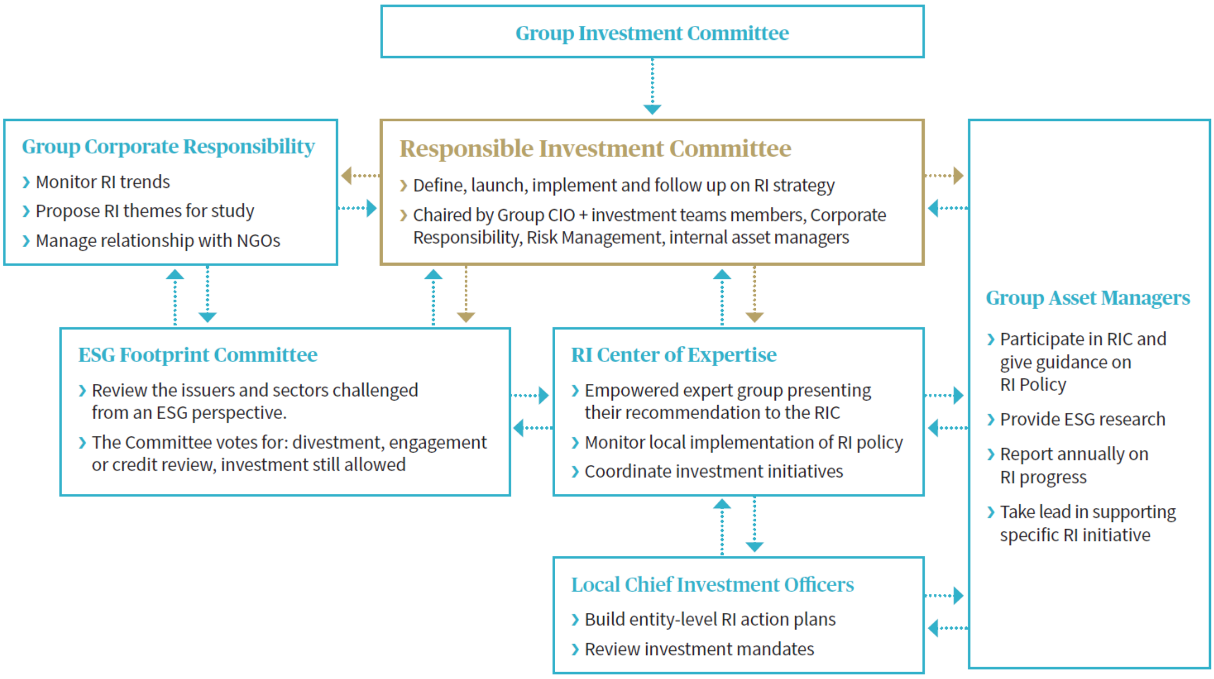
Although AXA expects companies in which it invests to adhere to best practice principles, it is recognized that departures from such principles may be justified circumstances. In such case, AXA will expect a considered explanation from the company.

Our engagement strategy and the progress of stewardship activities is overseen by the ESG Footprint Committee.

Responsible Investment Governance

The responsibility for the development, implementation and monitoring of this Policy sits with AXA's Responsible Investment Committee. The RI Committee is chaired by AXA Group's Chief Investment Officer and reports to the Group Investment Committee.

The RI Committee's decisions are interpreted and implemented by the local CIOs via the RI "Center of Expertise". The RI CoE is also charged with communicating and explaining the Group's RI strategy and directives to local investment teams as well as coordinating joint CIO initiatives.



Responsible Investment Training

We have embedded ESG considerations in our culture by providing a compulsory proprietary RI training to all members of our investment teams including the investment managers. This training conveys RI governance, policies, external commitments and includes an exercise in building a portfolio with a high ESG performance.

Asset Manager Monitoring

Asset manager monitoring is a key element of AXA's RI approach. It allows the RI Committee to track the progress of its asset managers in integrating consideration of ESG issues into their investment decision-making processes.

Our in-house investment management company AXA Investment Managers has developed its own comprehensive RI governance. In managing portfolios on behalf of AXA Group, AXA IM fully follows the principles of this policy. Similarly, our multi-asset manager Architas has developed thorough RI processes for fund selection and monitoring as part of the management of the unit-linked holdings.

Non-Group asset managers comply with the restrictions and sensitive investments guidelines of this policy. Additionally, AXA encourages delegated non-Group asset managers to integrate further ESG considerations into their investment decision-making as well as to be signatories of the UN Principles for Responsible Investment.

Publications

On an annual basis AXA Group publishes its **Climate Report** describing AXA's responsible investment and insurance activities in line with France's Article 173 for Energy Transition for Green Growth Act and recommendations from the Task Force on Climate-related Financial Disclosures (TCFD).

The corporate responsibility section of AXA Group's **Annual Report** provides up-to-date information on AXA's actions with regards to ESG topics including climate change.