



AXA GROUP POLICY ON HARASSMENT

At AXA, we are committed to providing a work environment where everyone belongs, and where differences are valued and thrive. Harassment has no place in an inclusive culture, and we do not tolerate it. We expect every employee to show respect for their colleagues, customers, and partners. In addition, any harassment of employees by a third party will not be tolerated.

The objective of this policy is to outline our commitment to prohibiting harassment in the workplace. This policy should be read in conjunction with AXA Group's Compliance & Ethics Code and, where additional requirements apply under local law, any local policy regarding harassment.

This policy applies globally to all AXA employees, interns, consultants, and independent contractors. The scope of this policy also extends to harassment by or harassment of applicants for employment, agents, brokers, suppliers, customers and others with whom we do business or seek to do business.

Harassment can occur in many workplace environments or situations including, but not limited to; something someone says or does (or does not say or do), whether in person or remotely, through an email, letter or document, a posting on the internet or intranet (for example, on LinkedIn, Twitter or on a blog), a message or an image sent by instant messenger applications (for example, on Microsoft Teams or WhatsApp) or a physical gesture. It is possible for harassment to take place while employees are attending business-related events, during or outside of normal working hours, including social events, or while traveling for business.

This policy is published on ONE Global Edition and local intranet sites.

Harassment

Harassment can take many forms and what amounts to legal harassment differs in local jurisdictions. As a general rule harassment consists of abusive behaviors that interfere with work performance, or any other treatment of an individual within the workplace or in the context of a working relationship that creates an intimidating, hostile or offensive work environment. It may, but does not have to be, related to a personal characteristic such as a person's age, nationality, race, ethnic origin, gender, sexual orientation, gender identity or expression, religion, marital status or disability. For the purposes of this policy, harassment includes, but is not limited to the following behaviors:

'Sexual harassment' includes unwanted sexual behavior or advances, requests for sexual favours or unwanted verbal, written or physical behavior of a sexual nature. Sexual harassment also includes harassment based on sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender.

Non-exhaustive examples of types of behavior considered to be sexual harassment are:



- Display or distribution of materials that are sexually suggestive, sexually demeaning or pornographic.
- Unwelcome comments or jokes, or the use of foul or obscene language of a sexual nature or regarding another's body, appearance, sexuality, sex life, gender identity, gender expression, or sexual orientation or transgender status
- Propositions or other unwelcome or offensive flirtation, requests for sexual favours or repeated unwanted requests for dates
- Sexual gestures or physical behavior including touching, grabbing, kissing, massaging, intentional pushing or brushing up against another

Other forms of harassment include:

(i) abuse of power or bullying defined as taking advantage of a superior position in the workplace to push another person to go beyond the appropriate scope of their duties which harms the individual's physical health, mental wellbeing or negatively impacts the working environment.

Non-exhaustive examples of those types of behavior are:

- Shouting at or threatening employees in public or private on a repeated / recurring basis which may include use of profanity/swearing by a superior directed towards an individual,
- A superior's repeated, unjustified, unreasonable criticism of an individual's work product or performance in an unduly aggressive or denigrating manner and/or willful, repeated, unjustified exclusion of an individual from work-related activities or with no professional / business justification.

(ii) repeated remarks or behaviors with the intention of (i) infringing the individual's rights and dignity, (ii) harming the individual's physical health or mental wellbeing and / or, (iii) damaging their working conditions or jeopardizing their professional career. Those behaviors can occur between people at any level within the organisation.

Non-exhaustive examples of those type of behaviors are the following:

- Targeted vulgarity and rudeness, personal insults or name-calling or public or private humiliation and/or intimidation and or/ deliberate and continued exclusion
- Spreading rumors that are intended to cause harm to an individual or persistent, unjustified and/or unnecessary negative attacks on a person's personal or professional life
- Repetitive unwelcome comments or jokes, or the use of foul or obscene language that is related to a personal characteristic

Leader Responsibilities

Our leaders play a very important role in ensuring that we maintain a safe and respectful environment free from harassment and other inappropriate behavior. We expect our leaders to be the example for our employees to follow. Our leaders have a responsibility to take appropriate action if they witness or become aware of inappropriate behaviors, harassment or retaliation and to actively encourage their teams to do the same.



Employee Responsibilities

Everyone has a part to play in creating an inclusive culture. We expect every employee, regardless of level or role, to treat each other, and others they interact with in work-related environments—whether in person or online—with respect and professional courtesy.

We want employees at every level to speak-up if they experience or witness any inappropriate behaviors. Speaking up shows that we care about each other and our business. We also encourage employees to participate in training that we offer so that they are familiar with what is required, and how we will support them.

Reporting Concerns

Any employee who believes they have experienced or witnessed any behavior that is in breach of this policy should report that concern to their Line Manager, Human Resources representative, speak-up@axa.com or their local whistleblowing email address.

Concerns may be raised either orally or in writing. Employees are encouraged to provide as much detail as possible relating to their concern to assist the investigation. If a concern is made orally, the employee may be asked for a written statement during the investigation.

If a concern is not raised in good faith or false or malicious information is provided, the relevant complainant, or those providing false or malicious information, may be subject to disciplinary action.

Investigating Concerns

If a concern has been reported to a Line Manager or a Human Resources representative, it must then be referred to Internal Audit as soon as possible.

All concerns will be independently investigated by Internal Audit in a fair, timely and thorough manner. Employees are required to cooperate with investigations. Internal Audit will partner with Human Resources and other relevant stakeholders during the period of the investigation.

Employee Wellbeing Support

Employee wellbeing is our priority. Employees will be asked whether they require support during and after the period of investigation by local Human Resources and given information about any other relevant persons or services that are available to support them.

Confidentiality

We are committed to maintaining confidentiality in relation to investigations. We will take all reasonable measures to ensure that details are disclosed only to those with a need to know. Any employee found to have disclosed information about an investigation may be subject to disciplinary action.



Non-retaliation

We do not tolerate retaliation against anyone who speaks up. Retaliation means any kind of unfair treatment, whether subtle or overt towards a person who raises a concern or who participates in the investigation. All employees who experience or witness any behavior they believe to be retaliatory should immediately report such behavior to their Line Manager, Human Resources representative, speak-up@axa.com or [their local whistleblowing email address](#). A person who is found to have retaliated against someone who raises a concern will be subject to disciplinary action.

Disciplinary Action

If an investigation reveals that a breach of this policy has occurred, then we will take appropriate disciplinary action against the employee responsible. The appropriate disciplinary action will be subject to applicable local laws but could include termination of employment where there has been a serious breach of this policy.

We may discipline an employee for any inappropriate behavior (as defined in this policy) discovered in investigations made under this policy, regardless of whether the behavior amounts to a violation of law. If the person who engaged in behavior in violation of this policy is not an employee, then we will take whatever corrective action is possible and appropriate under the circumstances.

Evolving Risks

We recognise that risks change, and to appropriately respond to new and evolving risks, this policy will be reviewed on an annual basis, and any changes will be published on ONE Global Edition, and local intranet sites.