



Human Rights Risk Assessment 2022 Report

June 2023

Introduction

- ➔ AXA Group purpose is to act for human progress by protecting what matters. As a company whose business is to protect people, their belongings and their businesses, we are determined to leverage our skills, resources and risk expertise to build a stronger and safer society. Striving to respect and protect Human Rights is an essential component of this purpose.
- ➔ We consider that our activities could have potential direct and indirect impacts on the Human Rights of our employees, customers, suppliers and contractors as well as potential indirect impacts on the Human Rights of others through the investments in companies.



- ➔ Consequently, AXA Group regularly, and at least every three years, conducts a Human Rights risk assessment which aims to identify the most relevant risks to Human Rights that the AXA Group should consider in conducting its business (acting both as an insurer and as an investor) and its operations.
- ➔ Latest study was conducted in 2022 by an independent third party and complete results were shared internally. This document is a shorter synthesis of these results.
It presents :
 - ➔ The methodology of the assessment
 - ➔ The risk mapping by population (employees, insurance product beneficiaries, investees, suppliers, contractors)
 - ➔ Illustrative mitigation measures in place
 - ➔ In appendix: list of elements for the documentary review, human rights risks definitions

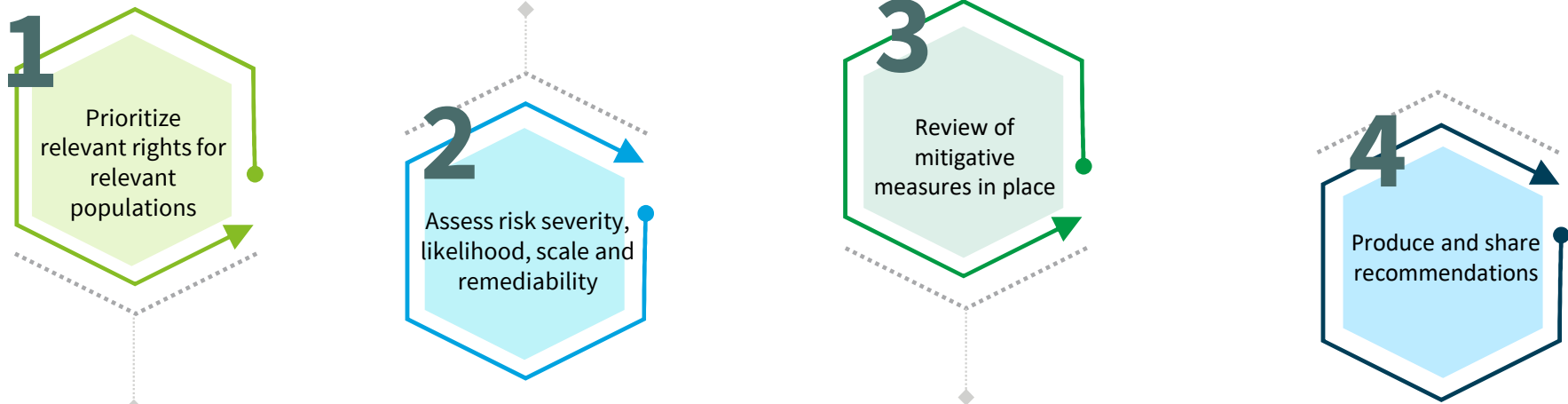


Methodology

Methodology of 2022 Human Rights Risk Assessment (1/2)

The methodology is compliant with UN Guiding Principles on Business & Human Rights and OECD Due Diligence Guidance for Responsible Business Conduct.

Level of risk (high, moderate or low) assessed through a two-tiered analysis based on severity and remediability across the relevant populations (see details in the following page)



1. Human Rights Holistic review

OVERARCHING CHARTERS

- Universal Declaration of Human Rights
- Covenant on Civil and Political Rights
- International Covenant on Economic, Social & Cultural Rights


LABOR RIGHTS CORE CONVENTIONS

- International Labour Organization 8 core conventions


SPECIFIC CONVENTIONS

- International Convention on Rights of Child
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families
- Convention on the Rights of Persons with Disabilities
- Convention on the Elimination of All Forms of Discrimination against Women


2. Identify relevant populations




Employees




Insurance Product Beneficiaries



Investees



Suppliers



Contractors

30+ interviews across key functions in the form of workshop, 140+ people engaged in online questionnaire, combined with close review of 50+ documents have been conducted to assess the current level of risk management at AXA Group's level with support of external expert third party

Methodology of 2022 Human Rights Risk Assessment (2/2)

Scale of the 2022 Human Rights Risk Assessment

- ➔ 145 AXA Group employees within Sustainability and AXA Hearts in Action Networks consulted via a dedicated anonymous survey
- ➔ 32 interviews of internal stakeholders involving professionals in the following field : Legal, Internal Control, Underwriting, Subscription, Emerging Customers, Partners, Investments, Human Resources, Purchasing, Reputation
- ➔ 54 internal and external documents reviewed covering a diverse range of AXA Group's operations
- ➔ **Scope of the Assessment** : In order to have an overview of AXA's human rights protection practices, this year's Human Rights Risk Assessment has adopted the scope of Group

An assessment through a 2-tiered analysis based on severity and remediation

Human Rights Issues (sample)	Impacted Value Chain	Human Rights Category	Severity Analysis			Remediation Analysis		
			Likelihood	Scale	Severity	Remediability	Leverage	Current Management
Privacy - Law enforcement agencies may make overboard requests for personal data or access overboard data following a court order - A company may retain, process, or access more personal information than required for the stated purpose - Foreign (or new) regulatory requirements may result in overboard access to personal data	Contractors	Article 12 - Freedom from interference with privacy, family, home and correspondence	Major	Major	Major	Insufficient	Partial	Insufficient
Freedom of Expression - Fear of surveillance and its consequence (both perceived and real) may result in rights holders not able to exercise their right to freely express themselves	Communities	Article 19 - Freedom of expression and opinion	Major	Major	Major	Insufficient	Partial	Insufficient
Anti-Discrimination - Rights holders in the company (employees) may be discriminated against based on characteristics such as gender, LGBT status, ethnicity, language, pregnancy, or disability for example, through reduced career opportunities	Communities	Article 2 - Freedom from discrimination	Major	Minor	Major	Insufficient	Robust	Insufficient
Security - Inappropriate actions by law enforcement agencies may result in customer or employee data captured by a company's systems (e.g. by law enforcement request or direct access following a court order) being used to violate the security of persons	Suppliers	Article 3 - Right to security of person	Major	Major	Major	Insufficient	Robust	Insufficient
Labor Standards - Rights holders in the supply chain may have certain labor rights violated, such as in the areas of remuneration, working hours, right to family life, and right to free association - Rights holders in a supply chain may suffer negative impact on their health and well-being as a result of poor health and safety procedures	Contractors	Article 23 - Right to Decent Work Article 25 - Adequate Standard of Living	Major	Major	Major	Insufficient	Partial	Insufficient

- ➔ **Severity** of the risk for rightsholders in the value chain analyzed through 3 major questioning categories – **Likelihood**, **Scale** and **Severity**
- ➔ Potential for risk remediation for different key players analyzed, based on 3 key lines of questioning – **Remediability**, Company **Leverage** and Current Level of **Management**

SEVERITY

- Major
- Moderate
- Minor

REMEDATION

- Insufficient
- Partial
- Robust

Prioritizing Relevant Rights

A holistic review of 100+ rights (per International Bill of Rights) and identification of the following universes of risks for AXA :

International Charters and Conventions

OVERARCHING CHARTERS

- [Universal Declaration of Human Rights](#)
- [Covenant on Civil and Political Rights](#)
- [International Covenant on Economic, Social & Cultural Rights](#)

LABOR RIGHTS CORE CONVENTIONS

- [International Labour Organization](#) 8 core conventions

SPECIFIC CONVENTIONS

- [International Convention on Rights of Child](#)
- [International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families](#)
- [Convention on the Rights of Persons with Disabilities](#)
- [Convention on the Elimination of All Forms of Discrimination against Women](#)



Relevant universes of risks identified

FIGHT AGAINST FORCED LABOR

- Rights of Child
- Right to adequate standard of living
- Right to be free from slavery
- Right to life, liberty, and personal security

FIGHT AGAINST DISCRIMINATION

- Right to equality
- Freedom of belief and religion
- Right to be free from discrimination

INCLUSION OF VULNERABLE POPULATIONS

- Rights of persons with disabilities
- Elimination of all forms of discrimination against women
- Right of indigenous people to natural resources
- Rights of migrant workers

WORKING CONDITIONS

- Freedom of opinion and expression
- Right of peaceful assembly and association
- Right to decent work and to join trade unions
- Right to social security
- Right to education
- Right to rest and leisure

Report to following section to access the details for each targeted population



Human Rights Risk Mapping

List of relevant Human Rights (1/3)

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

Note: The field is evolving and the mapping has gained in maturity over the years within the AXA Group: more risks are identified compared to the previous assessment in 2019 due to greater methodological granularity implemented in 2022.

Human Right	Employees	Insurance Product Beneficiaries	Investees	Suppliers	Contractors
Right to be free from discrimination	✓	✓	✓	✓	✓
Right to inclusivity in user access to products and services		✓			
Right to equal work, pay and opportunities for women	✓		✓	✓	✓
Right to access to opportunity and inclusive recruitment	✓		✓	✓	✓
Right to be protected from complicity with high-risk clients		✓	✓		
Right to privacy (including digital rights)	✓	✓	✓	✓	✓
Right to community land and resettlement		✓	✓		
Right to be free from corruption	✓	✓	✓	✓	✓

List of relevant Human Rights (2/3)

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

Human Right	Employees	Insurance Product Beneficiaries	Investees	Suppliers	Contractors
Right to safe and healthy living & working conditions	✓	✓	✓	✓	✓
Right to decent wages, benefits and working Hours	✓		✓	✓	✓
Right to own property	✓	✓			✓
Right to access vocational training and education	✓				✓
Right to be free from forced labour, modern slavery, human trafficking		✓	✓	✓	✓
Right to be free from workplace harassment, intimidation and exploitation	✓	✓	✓	✓	✓
Right to be free from child labour		✓	✓	✓	✓
Right to freedom of expression	✓	✓	✓	✓	✓
Right to peaceful assembly and association	✓	✓	✓	✓	✓
Right to collective bargaining	✓	✓	✓	✓	✓
Right to access grievances mechanisms and remedy	✓	✓	✓	✓	✓

List of relevant Human Rights (3/3)

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

Human Right	Employees	Insurance Product Beneficiaries	Investees	Suppliers	Contractors
Right to cohabitation with traditional livelihoods		✓	✓		
Right to be protected from climate-related events	✓	✓	✓	✓	✓
Right to sufficient and safe Water		✓	✓		
Right to ecosystem services		✓	✓		
Right to be protected from challenges related to sensitive/energy-intensive raw material extraction		✓	✓		
Right to be free from pollutions		✓	✓		
Right to be free from nuisances		✓	✓		



Illustrative mitigation measures in place

Illustrative Mitigation Measures Analysis (1/5)

The objective is to identify how AXA ensures that Human Rights are respected, and violations are addressed for each relevant population, considered as “right holders”: employees, insurance product beneficiaries, investments in asset, suppliers, contractors. 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 those populations. Assessment of mitigative measures is based on the mapping of policies and guidelines, and also review their enforcement across operations, their effectiveness factoring the perspective of the targeted population at stake, as well as the role potentially played by the grievance mechanism in place flagging issues and supporting continuous improvement.



Right-Holder : Employees

Relevant Rights	Mitigation Measures in Place (1)
Right to be free from discrimination	<ul style="list-style-type: none"> Human Rights Policy AXA & LGBT+ position paper AXA Compliance & Ethics Code On-going living wage study initiated in 2022 Diversity & Inclusion policy Agreement on the AXA Group European Works Council Inclusion Survey
Right to equal work, pay and opportunities for women	<ul style="list-style-type: none"> On-going living wage study initiated in 2022 Diversity & Inclusion policy
Right to access opportunity and inclusive recruitment	<ul style="list-style-type: none"> Diversity & Inclusion policy
Right to privacy (including digital rights)	<ul style="list-style-type: none"> AXA Compliance & Ethics Code AXA's Data Privacy Declaration
Right to be free from corruption	<ul style="list-style-type: none"> AXA Compliance & Ethics Code
Right to safe & healthy living & working conditions	<ul style="list-style-type: none"> AXA Compliance & Ethics Code Human Rights Policy AXA Health & Well-being Safety Policy Statement
Right to decent wages, benefits and working hours	<ul style="list-style-type: none"> On-going living wage study initiated in 2022 Diversity & Inclusion policy

Relevant Rights	Mitigation Measures in Place (1)
Right to own property	<ul style="list-style-type: none"> Human Rights Policy
Right to access vocational training and education	<ul style="list-style-type: none"> Access to Linked in Learning for 57 entities Agreement on the AXA Group European Works Council
Right to be free from workplace harassment, intimidation and exploitation	<ul style="list-style-type: none"> Human Rights Policy AXA Group Policy on Harassment AXA & LGBT+ position paper Inclusion Survey
Right to freedom of expression	<ul style="list-style-type: none"> AXA Compliance & Ethics Code Employee Pulse survey Inclusion Survey
Right to peaceful assembly and association	<ul style="list-style-type: none"> Human Rights Policy Agreement on the AXA Group European Works Council
Right to collective bargaining	<ul style="list-style-type: none"> Human Rights Policy Agreement on the AXA Group European Works Council
Right to access grievance mechanisms and remedy	<ul style="list-style-type: none"> AXA Compliance & Ethics Code Human Rights Policy AXA Group Policy on Harassment
Right to be protected from climate-related events	<ul style="list-style-type: none"> AXA Group Standards Reflex Sheet: Natural Disasters

(1) Internal or public documents used by the independent external party to identify if mitigation measures are in place



Illustrative Mitigation Measures Analysis (2/5)

Right-Holder : Insurance Product Beneficiaries



Relevant Rights	Mitigation Measures in Place (1)
Right to be free from discrimination	<ul style="list-style-type: none"> AXA & LGBT+ position paper Human Rights Policy AXA Conduct Framework
Right to inclusivity in user access to products and services	<ul style="list-style-type: none"> Human Rights Policy AXA Conduct Framework AXA Emerging Customers
Right to be protected from complicity with high-risk clients	<ul style="list-style-type: none"> AXA Conduct Framework
Right to privacy (including digital rights)	<ul style="list-style-type: none"> AXA Compliance & Ethics Code Human Rights Policy AXA's Data Privacy Declaration
Right to community lands and consultation for resettlement	<ul style="list-style-type: none"> Assessment from Natural World Heritage Sites policy
Right to be free from corruption	<ul style="list-style-type: none"> AXA Compliance & Ethics Code
Right to safe & healthy living & working conditions	<ul style="list-style-type: none"> AXA Group Policy on the Tobacco Industry AXA Group Policy on Controversial Weapons AXA Group Underwriting Sustainability Guidelines
Right to own property	<ul style="list-style-type: none"> AXA Compliance & Ethics Code
Right to be free from modern slavery, forced labor and human trafficking	<ul style="list-style-type: none"> Human Rights Policy
Right to be free from workplace harassment, intimidation and exploitation	<ul style="list-style-type: none"> AXA Group Policy on Harassment
Right to be free from child labour	<ul style="list-style-type: none"> Human Rights Policy

Relevant Rights	Mitigation Measures in Place (1)
Right to freedom of expression	<ul style="list-style-type: none"> Human Rights Policy
Right to peaceful assembly and association	<ul style="list-style-type: none"> Human Rights Policy
Right to collective bargaining	<ul style="list-style-type: none"> Human Rights Policy
Right to access grievance mechanisms and remedy	<ul style="list-style-type: none"> Human Rights Policy
Right to cohabitation with traditional livelihoods	<ul style="list-style-type: none"> Assessment from Natural World Heritage Sites policy
Right to be protected from climate-related events	<ul style="list-style-type: none"> AXA's Climate Strategy Human Rights Policy AXA Group Underwriting Sustainability Guidelines Product Approval Process
Right to sufficient and safe water	<ul style="list-style-type: none"> Green Business Framework Environmental risks insurance
Right to ecosystems services	<ul style="list-style-type: none"> Environmental risk insurance AXA Group Underwriting Sustainability Guidelines
Right to be protected from challenges related to sensitive/energy-intensive raw material extraction	<ul style="list-style-type: none"> AXA Group Policy on Investments in and underwriting of Tar Sands / Oil Sands AXA Group Energy Policy : Focus on the oil & gas industry AXA Group Underwriting Sustainability Guidelines Environmental risk insurance
Right to be free from pollution	<ul style="list-style-type: none"> Green Business Framework Environmental risk insurance

(1) Internal or public documents used by the independent external party to identify if mitigation measures are in place



Illustrative Mitigation Measures Analysis (3/5)



Right-Holder : Investees

Relevant Rights	Mitigation Measures in Place (1)
Right to be free from discrimination	<ul style="list-style-type: none"> AXA Group Human Rights Policy
Right to equal work, pay and opportunities for women	<ul style="list-style-type: none"> AXA IM Active Ownership and Stewardship Report (flagship initiatives) AXA Group Human Rights Policy
Right to privacy (including digital rights)	<ul style="list-style-type: none"> AXA IM Active Ownership and Stewardship Report (flagship initiatives)
Right to community lands and consultation for resettlement	<ul style="list-style-type: none"> AXA Group Ecosystem Conversion & Deforestation Policy, Natural World Heritage Sites Policy AXA IM Active Ownership and Stewardship Report (flagship initiatives)
Right to be free from corruption	<ul style="list-style-type: none"> AXA Group Compliance & Ethics Code
Right to safe & healthy living & working conditions	<ul style="list-style-type: none"> AXA Group Policy on the Tobacco Industry Active Ownership and Stewardship Report (flagship initiatives)
Right to be free from modern slavery, forced labour and human trafficking	<ul style="list-style-type: none"> Responsible Investment exclusion list process (2)
Right to be free from workplace harassment, intimidation and exploitation	<ul style="list-style-type: none"> AXA Group Policy on Harassment
Right to be free from child labor	<ul style="list-style-type: none"> AXA Group Responsible Investment Policy AXA IM Active Ownership and Stewardship Report (flagship initiatives) AXA IM's collaboration in Advance, an UN PRI-led stewardship initiative

Relevant Rights	Mitigation Measures in Place (1)
Right to freedom of expression	<ul style="list-style-type: none"> Responsible Investment exclusion list process
Right to peaceful assembly and association	<ul style="list-style-type: none"> AXA Group Human Rights Policy
Right to collective bargaining	<ul style="list-style-type: none"> AXA Group Human Rights Policy
Right to grievance mechanisms and remedy	<ul style="list-style-type: none"> AXA Group Human Rights Policy
Right to cohabitation with traditional livelihoods	<ul style="list-style-type: none"> AXA Group Ecosystem Conversion & Deforestation Policy, Natural World Heritage Sites Policy
Right to be protected from climate-related events	<ul style="list-style-type: none"> AXA Group Responsible Investment Policy AXA Group Climate Strategy
Right to ecosystems services	<ul style="list-style-type: none"> AXA Group Ecosystem Conversion & Deforestation Policy, Natural World Heritage Sites Policy
Right to be protected from challenges related to sensitive/energy-intensive raw material extraction	<ul style="list-style-type: none"> AXA Group Responsible Investment Policy AXA Group Energy Policy : Focus on the oil & gas industry

(1) Internal or public documents used by the independent external party to identify if mitigation measures are in place

Illustrative Mitigation Measures Analysis (4/5)



Right-Holder : Suppliers

Relevant Rights	Mitigation Measures in Place (1)
Right to be free from discrimination	<ul style="list-style-type: none"> Human Rights Policy Master Service Agreement Template / Sustainability Clause ESG Assessment Group Vendor Risk Framework & corresponding matrix
Right to equal work, pay and opportunities for women	<ul style="list-style-type: none"> Human Rights Policy Master Service Agreement Template / Sustainability Clause ESG Assessment Group Vendor Risk Framework & corresponding matrix
Right to access opportunity and inclusive recruitment	<ul style="list-style-type: none"> Human Rights Policy Master Service Agreement Template / Sustainability Clause Group Vendor Risk Framework & corresponding matrix
Right to privacy (including digital rights)	<ul style="list-style-type: none"> AXA Compliance & Ethics Code
Right to be free from corruption	<ul style="list-style-type: none"> ESG Assessment Group Vendor Risk Framework & corresponding matrix
Right to safe & healthy living & working conditions	<ul style="list-style-type: none"> Master Service Agreement Template / Sustainability Clause ESG Assessment Group Vendor Risk Framework & corresponding matrix
Right to decent wages, benefits and working hours	<ul style="list-style-type: none"> ESG Assessment Group Vendor Risk Framework & corresponding matrix
Right to be free from forced labour, modern slavery, human trafficking	<ul style="list-style-type: none"> Human Rights Policy Master Service Agreement Template / Sustainability Clause ESG Assessment Group Vendor Risk Framework & corresponding matrix

Relevant Rights	Mitigation Measures in Place (1)
Right to be free from workplace harassment, intimidation and exploitation	<ul style="list-style-type: none"> AXA Group Policy on Harassment ESG Assessment Group Vendor Risk Framework & corresponding matrix
Right to be free from child labour	<ul style="list-style-type: none"> Human Rights Policy Master Service Agreement Template / Sustainability Clause ESG Assessment Group Vendor Risk Framework & corresponding matrix
Right to freedom of expression	<ul style="list-style-type: none"> Group Vendor Risk Framework & corresponding matrix
Right to peaceful assembly and association	<ul style="list-style-type: none"> Group Vendor Risk Framework & corresponding matrix
Right to collective bargaining	<ul style="list-style-type: none"> Group Vendor Risk Framework & corresponding matrix
Right to grievance mechanisms and remedy	<ul style="list-style-type: none"> ESG Assessment
Right to be protected from climate-related events	<ul style="list-style-type: none"> Group Vendor Risk Framework & corresponding matrix Master Service Agreement Template / Sustainability Clause

(1) Internal or public documents used by the independent external party to identify if mitigation measures are in place

Illustrative Mitigation Measures Analysis (5/5)

Right-Holder : Contractors



Relevant Rights	Mitigation Measures in Place (1)
Right to be free from discrimination	<ul style="list-style-type: none"> AXA Compliance & Ethics Code Human Rights Policy Master Service Agreement Template / Sustainability Clause Group Vendor Risk Framework & corresponding matrix
Right to equal work, pay and opportunities for women	<ul style="list-style-type: none"> Human Rights Policy Master Service Agreement Template / Sustainability Clause ESG Assessment Group Vendor Risk Framework & corresponding matrix
Right to access opportunity and inclusive recruitment	<ul style="list-style-type: none"> Human Rights Policy Master Service Agreement Template / Sustainability Clause ESG Assessment Group Vendor Risk Framework & corresponding matrix
Right to privacy (including digital rights)	<ul style="list-style-type: none"> AXA Compliance & Ethics Code
Right to be free from corruption	<ul style="list-style-type: none"> ESG Assessment Group Vendor Risk Framework & corresponding matrix
Right to safe & healthy living & working conditions	<ul style="list-style-type: none"> Master Service Agreement Template / Sustainability Clause AXA Health & Well-being & Safety Policy ESG Assessment Group Vendor Risk Framework & corresponding matrix
Right to decent wages, benefits and working hours	<ul style="list-style-type: none"> ESG Assessment Group Vendor Risk Framework & corresponding matrix

Relevant Rights	Mitigation Measures in Place (1)
Right to be free from modern slavery, forced labour and human trafficking	<ul style="list-style-type: none"> Human Rights Policy Master Service Agreement Template / Sustainability Clause Group Vendor Risk Framework & corresponding matrix ESG Assessment
Right to be free from workplace harassment, intimidation and exploitation	<ul style="list-style-type: none"> AXA Group Policy on Harassment Group Vendor Risk Framework & corresponding matrix ESG Assessment
Right to be free from child labour	<ul style="list-style-type: none"> Human Rights Policy Master Service Agreement Template / Sustainability Clause Group Vendor Risk Framework & corresponding matrix ESG Assessment
Right to freedom of expression	<ul style="list-style-type: none"> Group Vendor Risk Framework & corresponding matrix
Right to peaceful assembly and association	<ul style="list-style-type: none"> Group Vendor Risk Framework & corresponding matrix
Right to collective bargaining	<ul style="list-style-type: none"> Group Vendor Risk Framework & corresponding matrix
Right to access grievance mechanisms and remedy	<ul style="list-style-type: none"> ESG Assessment
Right to be protected from climate-related events	<ul style="list-style-type: none"> Group Vendor Risk Framework & corresponding matrix Master Service Agreement Template / Sustainability Clause

(1) Internal or public documents used by the independent external party to identify if mitigation measures are in place



Appendix

List of Elements for the Documentary Review (1/2)

→ GROUP DOCUMENTS

- Group Human Rights Policy*
- Compliance & Ethics Code*
- Group Policy on Harassment*
- Group Webpages*:
 - [Human rights & Vigilance plan | AXA](#)
 - [Thrive within a diverse community | AXA Group](#)
 - [Investments | AXA](#)
 - [Social dialogue and mobility | AXA](#)
 - [Cyber Security and Data Privacy | AXA](#)
 - [Compliance & Ethics | AXA](#)
 - [Employee wellbeing and health & safety | AXA](#)
 - [AXA Group's Climate Strategy](#)
- Group Sanctions Policy
- AXA Group Health & Well-Being Safety Policy*

→ EXTERNAL DOCUMENTS

- EcoVadis Ratings Methodology Overview and Principles (not AXA Results)
- AXA SA EcoVadis Scorecard (2021)
- 2022 Group Response to the CSA/DJSI Questionnaire
- 2020 UN PRI Assessment Report – AXA Group

→ ANNUAL DOCUMENTS

- 2021 Universal Registration Document*
- 2019's Human Rights Risks Assessment (summarized* and detailed version)
- 2022 Climate and Biodiversity Report*
- Reputational Risks Position Paper: AXA & LGBT+
- Controversy Paper: AXA's activities in Israel
- Future Risks Reports* (survey)
- Gender Diversity within AXA's leadership teams (2019 to 2021)

→ PROCUREMENT

- Group Vendor Risk Framework
- Responsible Procurement Guidelines
- Sustainability Clause
- Risks Matrix (Excel)
- Detailed Standard Contract (with compliance and anti-corruption clauses)

→ PRIVACY & DATA RIGHTS

- Minutes Data Privacy Officers (March 15th)

* Public document

List of Elements for the Documentary Review (2/2)

➔ **INSURANCE & INVESTMENTS**

- ➔ AXA Group Underwriting Sustainability Guidelines
- ➔ Responsible Investment Policy*
- ➔ Sector guideline: soft commodity derivatives*
- ➔ Sector guideline: Controversial Weapons*
- ➔ Sector guideline: Oil and gas industry policy*
- ➔ Sector guideline: Tobacco divestment policy*
- ➔ Sector guideline: Ecosystem Conversion & Deforestation and World Heritage Sites Policy*
- ➔ Sector guideline: coal extraction and coal-based energy*
- ➔ Group Policy on Investments in Palm Oil Production, Agricultural land, Timberland and Forestry
- ➔ 2021 AXA IM's Active Ownership and Stewardship Report*
- ➔ Emerging Customers – 2022 Introduction document
- ➔ Emerging Customers Client Value Improvement Plan
- ➔ Inclusive Protection Indicator
- ➔ Inclusive Protection Overview
- ➔ AXA Group Protection & Savings Underwriting Guidelines
- ➔ Conduct & Customer Protection presentation
- ➔ Inclusive Protection Catalogue

* Public document

Human Rights Risks Definitions

POTENTIAL HUMAN RIGHTS RISKS	DEFINITION
Freedom from Discrimination	Risk of discrimination with respect to policies, treatment, promotion or advancement, hiring practices, remuneration (pay) and benefits particularly on the basis of HIV-positive status, LGBT, race, or gender.
Right to Equal Work, Pay and Opportunities for Women	Risk of discrepancies in pay, promotion and executive representation for female workers and entrepreneurs.
Religious Freedom and Dress	Risk that policies or practices may directly or indirectly infringe on a person's freedom of religion and/or infringe on a person's ability to wear religious symbols at work.
Access to Opportunity and Inclusive Recruitment	Risk that policies or practices may directly or indirectly infringe on territorial development via inclusive recruitment and local procurement policies and investments in local enterprise in particular -- bearing in mind potential socio-cultural tensions at a local level, emphasizing accessibility policies for vulnerable segments.
Inclusivity in user access to products and services	Issues pertaining to discriminating against users' access to services and/or products - notably through AXA Group's pricing policy with regards to vulnerable groups in particular, emphasizing principles of responsible marketing and remuneration across the Group's financial products
Right to Safe and Healthy Living & Working Conditions	Risk that failure to ensure adequate health and safety measures may infringe on the ability for beneficiaries to enjoy 'favorable working & living conditions' -- inclusive of a proactive policy on mental health and the prevention of psycho-social risks.

Human Rights Risks Definitions

POTENTIAL HUMAN RIGHTS RISKS	DEFINITION
Right to Decent Wages, Benefits and Working Hours	Risk that employees receive inadequate wages, social security, benefits and work excessive hours and overtime, have insufficient breaks or that paid holidays be comparatively insufficient, with an emphasis on mainstreaming living wages across the Group's contractual engagements.
Right to own property	Risk that Group policies or practices may directly or indirectly infringe on clients' ability to effectively use legitimate earnings to access property, emphasizing the Group's advisory role, both in terms of promoting savings and anticipating major crises (sickness, loss of job, loss of family member...) and responsibility to deliver sufficient protection.
Access to vocational training and education	Risk that Group policy may run counter to employees' access to education and vocational training opportunities, effectively hindering lifting socially excluded children and adults a means to evolve out of poverty and into society.
Forced Labor, Modern Slavery, Human Trafficking	Risk that employees may be subject to work that is performed involuntarily and under the menace of any penalty. It refers to situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as manipulated debt, retention of identity papers or threats of denunciation to immigration authorities.
Freedom from Workplace Harassment, Intimidation and/or Exploitation	Risk that Group policies or practices may directly or indirectly facilitate harassment, intimidation, and/or exploitation, especially in regard to women. These principles of non-discrimination apply in particular to migrant workers.
Child Labor Working Age	Risk that supplier policies and practices permit and/or encourage child exploitation, slavery, poor working conditions. Risk that the company may employ workers under the legal minimum age and/or under 15 years old.

Human Rights Risks Definitions

POTENTIAL HUMAN RIGHTS RISKS	DEFINITION
Freedom of Expression	Risk that Group policies or practices may deny beneficiaries the right to freedom of expression and opinion.
Peaceful Assembly and Association	Risk that employer policies or practices deny beneficiaries the right to assemble peacefully and join associations. Risk that beneficiaries may feel undue pressure to adhere to certain organizations.
Right to join trade-unions (collective bargaining)	Risk that policies or practices may deny beneficiaries the right to join trade-unions or make them feel undue pressured to adhere to certain organizations.
Access to Grievances Mechanism and Remedy	Risk that Group policies or practices may directly or indirectly infringe on users' awareness and access to grievance mechanisms (through effective communications and platform management) - and through them, their ability to seek remedy for any violation of their fundamental Human Rights
Protection from complicity with high-risk clients	Risk that Group development policies may directly or indirectly generate complicity with high-risk clients' ability to abuse human rights
Privacy & Digital Rights (digital identity, cybersecurity, use of surveillance technologies)	Risk that company records on employees, clients and contractors be made available to others without their express written consent - emphasizing users' informed choice with regards to data-powered commercial services.
Community Land Rights and Ressentlment	Risk that the company fails to appropriately consult a community that has the right to give or withhold their consent on lands they customarily own, occupy or use, and thereby are not abiding by the principles of Free, Prior, and Informed Consent (FPIC).
Cohabitation with Traditional Livelihoods (IP)	Risk that practices may, directly or indirectly impede on local communities' traditional livelihoods (hunting, pharmacopea...) through hindering their access to natural resources key to their diet, clothing, housing and medical care.

Human Rights Risks Definitions

POTENTIAL HUMAN RIGHTS RISKS	DEFINITION
Protection from Climate-Related Events (floods)	Risk that extreme weather situations (exacerbated by climate change) cause greater risk of resulting in severe harm or loss of life.
Intensification of Climate Change through Group Activity	Risk that company practices, particularly those involving greenhouse gas emissions and energy use, may contribute to climate change resulting in violations of the Human Rights (health, food, water, self-determination...) of climate-vulnerable populations.
Access to Sufficient and Safe Water (Freshwater/Groundwater)	Risk that company policies or practices may infringe on the right to sufficient, safe, acceptable, physically accessible and affordable water for personal and domestic uses; Risk that company suppliers source water from water-stressed areas for production and infringe on local communities rights to water.
Access to Ecosystems Services	Risk that company policies or practices may infringe on communities' right to sufficient, safe, acceptable, physically accessible and affordable ecosystem services, for personal and domestic uses, emphasizing impacts on water and biodiversity, including impacts of land use changes, soil artificialization and deforestation)
Protection from Sensitive/Energy-Intensive Raw Material Extraction	Issues pertaining to adapting the work environment and supplier practices to develop specific plans with regards to environmentally-sensitive raw material sourcing activities (quarries, cement, bitumen, steel...), which may impede on the fundamental liberties of local communities
Community Protection from Pollutions (Air, Soil, Water...)	Risk that the improper disposal of products, supplies, or packaging could cause harm to the environment and human health.
Community Protection from Nuisances (Noise, Smell...)	Risk that noise, water, land or air pollution (i.e ongoing air traffic or construction noise after normal business hours) create a disturbance for people in the surrounding community.
Private Corruption	Risk of corruption with non-government actors such as, agents, intermediaries, partners, subcontractors (suppliers, distributors, etc.), customers, local communities, employees, management, recruiting agencies, etc. that is related to running the business. Types of corruption may include: facilitation payments, bribes/kickbacks, gifts, charity contribution, nepotism, etc