

Modern Slavery Statement

This statement is made by XL Insurance Company SE (ARBN 083 570 441) (the “**Reporting Entity**”) pursuant to Section 13 of the Australian *Modern Slavery Act 2018* (Cth) (the “**MSA**”). It sets out the steps that the Reporting Entity has taken during the 2023 financial year to combat and prevent all forms of modern slavery in its business and supply chains.

The Reporting Entity is part of AXA and operates in Australia through a registered branch (ARBN 083 570 441). AXA, a worldwide leader in financial services, has a long history of adhering to and promoting strong professional ethics and is committed to conducting its business according to the highest standards of honesty and fairness. This commitment to observing such ethical standards is designed not only to ensure compliance with applicable laws and regulations in the various jurisdictions where AXA operates but also to earn and keep the continued trust of its clients, shareholders, personnel and business partners. AXA believes that its success and reputation is not only dependant on the quality of its products and the services provided to its clients, but also in the way it does business. This includes a strong commitment to human rights and therefore, it welcomes the transparency promoted by the MSA.

1 Reporting Entity’s structure and business

The Reporting Entity is part of AXA XL, a division of AXA. AXA XL provides property, casualty, professional and speciality products, as well as risk consulting services, to industrial, commercial and professional firms, insurance companies, other enterprises and consumers throughout the world.

2 Reporting Entity’s supply chain

AXA XL’s products are distributed to clients through a large network of brokers and coverholders. We also underwrite insurance and reinsurance at Lloyd’s of London, where one of our group companies acts as the managing agent for a number of syndicates.

The Reporting Entity’s supply chains includes suppliers of IT and communications, property, facilities management, office equipment and supplies, catering, marketing services and professional services such as legal, auditing, banking and personnel recruitment.

3 Engagements and policies in relation to modern slavery

For the purposes of this Section 3, references to AXA shall mean a reference to “AXA Group”. AXA seeks to respect internationally recognized human rights principles as defined by the United Nations Universal Declaration of Human Rights, the core standards of the International Labour Organisation and the Guiding Principles for the implementation of the United Nations “Protect, Respect and Remedy” Framework (Ruggie Principles). AXA is also committed to applying international standards applicable to insurers and investors such as the UN Principles for Responsible Investment (“**UN PRI**”), the UN Principles for Sustainable Insurance (“**UN PSI**”), the UN Global Compact (“**UN GC**”), the OECD recommendations and the Global Deal. Over the years, AXA has adhered to the UN GC and has committed to promoting its ten guiding principles, including those on human rights (such as avoiding complicity in human rights abuses and supporting and respecting the protection of internationally proclaimed human rights) and labour standards (such as supporting the elimination of all forms of forced and compulsory labour and the effective abolition of child labour).

In addition, AXA has put in place policies to support its commitment to ethical business practices across the organisation. These include:

- **The AXA Group Human Rights Policy¹** (updated in 2023), which is based on an assessment AXA uses to identify the human rights that could be impacted by the business activities of insurance companies (i.e. insurance, investment, own operations) and to define priority areas for human rights due diligence at AXA². The policy aims at preventing human rights abuses and reflects AXA's adherence to the general and sectoral international standards mentioned above. The Policy sets up our approach to human rights with respect to our different activities: as a responsible company (as an employer and as a business partner), insurer and investor.
- **The AXA Compliance and Ethics Code (the "Code")³**, which applies to all employees and subsidiaries worldwide establishes guiding principles to treat its customers fairly and professionally by being honest and accountable when promoting products and services. Senior officers of AXA entities, as well as all employees of AXA XL, are asked to submit an annual certification to confirm that they comply with all the provisions set out in the Code.
- **AXA Group Vigilance Plan (the "Vigilance Plan")**, adopted by AXA S.A. to comply with the recent requirements of the French "*devoir de vigilance*" law, sets out the reasonable vigilance measures established and implemented by AXA to identify risks and prevent serious violations to human rights and fundamental freedoms, health and safety of individuals and the environment resulting from AXA's activities and those of the companies it controls, directly or indirectly, as well as from the activities of subcontractors or suppliers with which AXA entities have an established business relationship, when these activities are related to this relationship. The Vigilance Plan describes AXA's existing system of internal control and risk management which includes a number of tools and procedures implemented within AXA to support enforcement of AXA standards and policies in operating entities and compliance with applicable regulations and describes AXA's procurement processes. The monitoring of the implementation of vigilance measures and assessing their effectiveness, is carried out, at a high level, by AXA's system of internal controls and in addition, AXA relies on a self-assessment reporting process for certain AXA entities. For more information on procurement processes and the gaps identified by the self-assessment conducted in 2023, please refer to the Vigilance Plan set out at Section 4.6 of the Universal Registration Document (URD) for FY2023⁴. In 2023, AXA also continued its efforts in the responsible procurement space relating to IT and general expenses contracts, for example, by: (i) providing training and promoting adherence to a code of ethics by AXA personnel; and (ii) requiring a sustainability clause be included in procurement contracts.

¹ AXA Group Human Rights Policy - 2023 - ENG (axa-contento-118412.eu)

² The assessment is based on the following overarching Charters, labor rights core conventions and specific conventions - Universal Declaration of Human Rights, Covenant on Civil and Political Rights, International Covenant on Economic, Social & Cultural Rights, International Labour Organization's core 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.

³ www-axa-com/9322d10b-418d-4b26-80eb-aab4fe71a78a_axa_codeethic_versionen_decembre2018_vdef_b.pdf (axa-contento-118412.eu)

⁴ untitled (axa-contento-118412.eu)

The AXA Group Human Rights Policy, the Code and the principles and standards mentioned above all apply to the Reporting Entity. In addition, the Reporting Entity has the following policies in place and reports on the following:

- an annual Sustainability report which sets out how AXA XL acts responsibly as a division; and
- a supplement to the Code that contains additional compliance policies addressing such topics as data privacy, dignity at work, trade sanctions compliance, conflicts of interest and anti-bribery.

A third-party consultant engaged by AXA also carried out a human rights risk identification review of AXA entities, including AXA XL. The review looked at what management systems and training materials (as examples) were in place to prevent violation of human rights risks.

4 Management of the modern slavery risk in the Reporting Entity's operations

The Reporting Company acknowledges that there may be modern slavery risks associated with having operations in countries ranked by The Global Slavery Index 2023 as being high risk for modern slavery. These risks are mitigated by the Reporting Company's skilled workforce and its compliance with AXA Group's policies and ethical business practices, as outlined in section 3, 'Engagements and policies in relation to modern slavery'.

The Reporting Company also recognises that a number of its supply chain categories may possess higher risks of modern slavery (including human and labour rights violations) due to their country of origin/manufacture, industry, and workforce. Some examples of these include networks & telecommunications, workplace equipment (including tablets), servers' infrastructure, building catering and foods and building services (repair, security, cleaning).

AXA acknowledges its responsibility to respect human rights in its operations and conducts its business in compliance with applicable employment regulations in the jurisdictions in which it operates. AXA is committed to upholding the right of freedom of association and collective bargaining, as well as maintaining constructive labour management relations in every country in which it does business, and to doing so with due respect for different national approaches to social dialogue. AXA respects the rights of its employees to enjoy just and favourable conditions of work, including health and safety protections, and is committed to providing adequate information and training on health and safety and wellbeing issues.

In addition, AXA promotes diversity, equity, and inclusion by prohibiting any form of discrimination between current, past or potential staff on the basis of age, race, nationality, ethnic origin, gender, sexual orientation and identity, religion, marital status or disability.

AXA XL is continuing to build a culture that values all individuals, backgrounds and ideas. AXA XL is doing this by fostering an environment where it embraces differences and takes advantage of diversity to be a better place for employees and to better serve its clients. There are key initiatives established focusing on: learning and development; inclusive leadership programs; challenging traditional thinking about culture and development; and recruitment in line with a diverse candidate policy.

5 Assessment of the Reporting Entity’s largest suppliers and due diligence process in relation to the Reporting Entity’s supply chains

The Reporting Entity ensures that it works with suppliers that meet its standards with respect to ethics and sustainability through a clearly documented process for supplier selection and contracting. The AXA XL Procurement Policy references the Responsible Procurement principles that AXA XL adheres to (e.g. AXA XL Sustainability commitments) in helping to ensure that AXA XL works with responsible vendors. Appropriate supplier due diligence is carried out in relation to all third-party organisations which the Reporting Entity engages for the distribution of its products.

In accordance with the above process, the Reporting Entity’s applicable standard contractual terms with suppliers include specific reference to AXA’s sustainability requirements and appropriate provisions are included requiring suppliers to comply with applicable laws and regulations, including the MSA where applicable. Any material challenges by the supplier to the standard wording is reviewed by AXA XL’s sustainability team to consider how best to ensure the supplier has appropriate controls in place.

Any detection of a direct or indirect violation by the supplier of the AXA sustainability requirements would be discussed directly with the supplier with a view to establishing a mutually agreed and documented corrective action plan. Where any issue is not resolved satisfactorily, the standard AXA sustainability provision includes a right for the Reporting Entity to end their relationship with the relevant supplier.

In addition, the Reporting Entity seeks to prevent or mitigate the adverse human rights impact of certain of their suppliers by the use of an independent third-party tool to assess a number of sustainability topics, including child and forced labour.

6 Training and information available to staff

Employees of the Reporting Entity are required to complete periodic compliance training, including applicable training on the Code. Procurement colleagues are also informed of the AXA XL Procurement policy which references the Responsible Procurement principles that AXA XL adheres to, and they have to perform mandatory training on this when joining the Global Sourcing & Procurement department. The Reporting Entity also recognises the importance of ensuring that certain employees and managers who are in a position to identify and respond to slavery risks in our business and supply chains have training and access to appropriate assessment tools to aid in the prevention and detection of illegal or unfair practices.

7 Further steps

AXA XL continues to benefit from the increased global presence and knowledge of AXA. Along with AXA XL’s own processes, this assists the Reporting Entity in its ongoing MSA compliance obligations.

The Reporting Entity’s Board of Directors approved this statement, which constitutes the Reporting Entity’s modern slavery statement for the financial year ending 2023.



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XL Insurance Company SE
Paul-Henri Rastoul, Director, 19 day of September 2024