



XL Insurance  
Reinsurance

AXA XL Code for Representatives  
November 2021

## **Introduction**

AXA XL values its relationship with you as our business partner and the role you play in providing our customers with superior insurance products, claims handling, or risk management related services. As you know, AXA XL is committed to the highest standards of legal and ethical conduct. Naturally, we expect equally high standards of our partners that act on our behalf.

While we have a Code of Compliance and Ethics for our employees, we also have this adapted version for our Representatives. Important matters such as Anti Bribery, Trade Sanctions and Data Privacy are all covered. We have a shared interest in ensuring compliance with relevant laws and regulations at all times.

We encourage you to seek further support and guidance from your usual AXA XL contact or to email [legalcompliance@axaxl.com](mailto:legalcompliance@axaxl.com)

Thank you

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# Introduction to Our Code

## **Purpose of this Code for Representatives**

AXA XL expects its Representatives to behave with integrity, honesty and professionalism; and also to put our Customers First. This Code explains the standards expected and should help you make the right decisions and point you to the right resources when you need to ask questions, voice concerns, or report suspected or actual violations. The Code also demonstrates our mutual commitment to compliance with applicable laws and regulation. And by knowing and following AXA XL's Code, we can maintain the trust of our various mutual clients.

## **Scope of the Code**

This Code applies to business partners acting on AXA XL's behalf, including Managing General Agents, coverholders, third party claims administrators, underwriting managers and risk managers providing services to AXA XL customers, collectively "Representatives". For the purposes of the Code, "AXA XL" includes all majority owned entities of the AXA XL Division of AXA Group SA. AXA XL expects all companies and individuals with whom it does business to adhere to the same high standards of legal and ethical conduct as does AXA XL.

To the extent that different or more specific requirements apply in a contractual agreement between AXA XL and its Representatives, the contractual agreement takes precedence.

## **Complying with AXA XL Policy, Local and International Laws and Regulations**

Rules, laws, and regulations vary from one country to the next. There may be situations where this Code conflicts with local laws and, in such situations, local law will prevail. If you believe there may be a conflict between applicable laws or between a law and this Code, contact your relationship manager at AXA XL prior to taking any action.

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AXA XL operates in the highly regulated (re)insurance industry where compliance with applicable insurance and reinsurance regulations and cooperation with regulators is extremely important. Different AXA XL insurance and reinsurance companies, on behalf of whom you may be contracted to act, are regulated in the jurisdictions in which they operate. Please take time to understand the local regulatory requirements that apply to you and to the AXA XL companies you work with.

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# Knowing What is Expected of You

## Our Shared Obligations

As Representatives of AXA XL, you are expected to understand and follow the requirements and principles explained in this Code. In addition, you must:

- Uphold AXA XL's commitment to legal and ethical conduct in all of your business activities with, or for, AXA XL;
- Familiarize yourself with, and follow, all policies, laws and regulations that apply to your activities on behalf of AXA XL;
- Treat all AXA XL customers with fairness and respect.

This Code attempts to address the most common compliance and legal issues that you might encounter when acting on AXA XL's behalf. However, it cannot address every situation that may arise. You should assess any potential issues by asking yourself the following questions:

### If in doubt, ask first, act later

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**Q:** What if I have a concern that is not covered in this Code?

**A:** This Code cannot address every potential concern that you may have. However, the standards, values, and other guidance discussed in this Code can help you make the right decision. You must act legally and ethically even in the absence of specific laws, regulations or corporate policies. If you need more assistance, contact your relationship manager at AXA XL who will seek further advice as appropriate.

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## Fairness and Respect for All

While this Code is mainly designed to guide Representatives on how to comply with regulatory requirements applicable to insurance business, it is important to also underscore other AXA XL values and principles and how we treat everyone with whom we interact at a more personal level. For example, when interacting with our customers you must always treat them with fairness, respect and professionalism. You must not discriminate against, harass, or otherwise mistreat anyone, and the consequences for any untoward behavior may be severe. Equally, AXA XL is committed to the same high standards in its own treatment of its Representatives.

# Voicing Questions and Concerns

AXA XL's reputation for integrity depends on your ability to speak up and seek advice when you know of, or suspect, conduct that falls below the expectations set out in this Code. Since you share a responsibility to uphold this Code and all applicable laws and regulations, you must know how to recognize possible violations and take appropriate action.

## Resources

If you observe or suspect unethical or illegal conduct that may implicate AXA XL, you must immediately report it. You can use the AXA Group Speaking Up hotline or the AXA XL hotline for reporting by telephone or online. [www.axaxl.com/speakup](http://www.axaxl.com/speakup)

## Non-Retaliation

Everyone must feel comfortable raising concerns without fearing retaliation. AXA XL does not tolerate any act of retaliation by any Representative against anyone who makes a good faith report of actual or suspected misconduct. In addition, AXA XL prohibits retaliation against anyone who, in good faith, participates in investigations of reports. Participating or reporting in “good faith” means that you have provided all of the information you have and that you believe it to be true.

Retaliatory acts may lead to disciplinary action against the person responsible for the retaliation, up to and including termination. If you believe you have experienced retaliation, you should report it immediately.

## Investigations

AXA XL makes every effort to investigate all reports of alleged violations of the Code promptly, thoroughly and fairly, taking appropriate action whenever necessary. You may be asked to participate in an investigation and you must comply with any such request, including by making documents and employees available.

AXA XL makes all reasonable efforts to safeguard confidentiality, both during and after investigations.

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**Q:** What is a good faith report?

**A:** Making a report in good faith means coming forward with all the information you have about a situation you believe violates the law, AXA XL policy, or this Code, and that you believe to be true. It should be motivated by a genuine concern or suspicion. Making false or malicious reports means you are not acting in good faith.

**Q:** What kind of matter should I report?

**A:** You should report any suspected illegal or criminal activity or fraud, as well as suspected or actual violations of this Code or AXA XL policy. This might include undisclosed conflicts of interest, unfair treatment of a customer, or abuse of confidential or proprietary data. You can also report concerns relating to unfair treatment involving you or your business.

**Q:** I know of a situation that may violate AXA XL’s Code. Should I report it even if I am not completely sure there is a problem?

**A:** Yes. You are responsible for reporting possible violations immediately. Report it to AXA XL via the Speaking Up hotline, or contact [legalcompliance@axaxl.com](mailto:legalcompliance@axaxl.com), in confidence. Your report will be taken seriously and investigated. It is better to report a suspicion that turns out not to be an issue than to ignore a possible violation. We encourage reports from our Representatives as well as their employees.

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## Consequences of Code Violations and Misconduct

Violations of AXA XL’s Code for Representatives, including acting illegally or unethically, can have serious consequences, including termination of our agreement with you and possible civil or criminal liability.

# Marketplace Conduct

## Fair Dealing

To the extent you are engaged in insurance or reinsurance related activities on behalf of AXA XL, you must operate in accordance with the law and use fair and ethical sales, marketing, underwriting and claims practices.

To uphold this commitment, you should never:

- Knowingly provide false information to our customers, business partners, or competitors
- Misrepresent or conceal facts in order to gain a competitive advantage

- Engage in any sort of illegal or unethical conduct

If, at any time, you feel like you may have acted or been pressured to act unethically or dishonestly, please discuss this issue with your AXA XL relationship manager.

## **Our Customer Promise**

At AXA XL, we are committed to providing all customers with excellent care and service throughout their journey with us and we expect our Representatives to provide the same care and service. Our customers include individuals, small or medium sized enterprises (SMEs), as well as, large commercial clients. It is important that the insurance knowledge of our customers is always understood and taken into account at any stage in your relationship with them. Individual customers and SMEs are likely to have less knowledge, so greater care is needed to ensure that these customers' needs are properly considered in all aspects of decision-making affecting them and, in particular, during product design, sales and claims servicing.

We aim to see things from the customer's point of view and to treat them fairly and professionally in all our dealings. We also want to prevent problems from arising or to identify and address them promptly.

Our reputation and success depend on having the correct attitude toward our customers. This involves speaking up if you have concerns about something you think is wrong and that may adversely affect our customers, or that is unfair to our customers. The reporting processes explained in this Code should be followed.

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**Q:** What is an example of good conduct practice at AXA XL?

**A:** There is a risk that poor conduct practices can arise in many different circumstances. For example, in the way a claim is handled. This is a time when our customers expect, and are entitled to receive, an excellent level of service. If you are involved in handling claims on behalf of AXA XL, remember that an AXA XL policy is a promise – we promise to investigate, manage, and resolve a covered claim as soon as possible. We focus on customer needs and collaborate to find the right solutions. We are publicly committed to our goal of consistent and superior service wherever, and whenever, customers need us.

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Whether claims are handled in house, or by Representatives acting on our behalf, we must ensure that we deliver on our promises. All claim notifications should be promptly acknowledged and investigated properly, and all covered claims should be paid within reasonably prompt timelines, and in accordance with applicable service level agreements.

Good communication throughout the claims process reassures our customers that the claim is being addressed. This communication should be prompt, clear, and in plain language so that the customer can understand what are sometimes technical or legal matters.

It is also important that Claims handlers are familiar with the agreed processes for handling complaints. Many complaints arise from the claims process and it is important to address any signs of customer dissatisfaction.

## **Competition Laws**

Competition laws (sometimes called antitrust laws) prohibit formal and informal agreements and practices that restrain trade. Violations of competition laws may carry severe consequences for the individuals involved and for the business involved, your Company, and AXA XL, including potential civil and criminal liability. Therefore, you should familiarize yourself with, and follow, all applicable competition laws and avoid even the appearance of an anti-competitive business practice.

This means you must avoid even casually discussing with, or for the benefit of, any competitors:

- The division or allocation of markets, territories or clients or any anti-competitive business practice at any time, including at industry meetings or trade association events

- Prices or price-related information and any information relating to or affecting premiums, rates, or commissions
- Boycotting of a person, client, or an insurance product or service, or any other product or service, including whether to quote certain types or classes of risk
- Matters that would affect the availability or volume of types of business written or not written, terms of (re) insurance coverages or of other services or markets
- Activities that could limit the number of (re) insurers competing to sell (re)insurance
- Bid-rigging, leveraging or pay-to-play
- Any other commercially sensitive information

In addition, you should not price business “on best terms”, submit false or artificially inflated bids, establish exclusive-dealing relationships with brokers or insureds, or otherwise breach applicable law. Antitrust laws are complex. If you suspect that you may be engaging in, or are asked to engage in, any of these discussions or activities when representing AXA XL, you should stop immediately and seek assistance.

### **Confidentiality and Intellectual Property of Others**

Gathering information is essential to protect AXA XL’s market position and to remain globally competitive. However, anyone acting on AXA XL’s behalf must only obtain information legally and responsibly. Therefore you must always:

- Safeguard others’ confidential information and intellectual property
- Prevent colleagues and business partners from disclosing confidential, competitive or proprietary information—this includes all non-public information that might be of use to our competitors, or harmful to AXA XL or its customers if disclosed
- Avoid talking to anyone about, or using for your own or AXA XL’s benefit, any former employer’s trade secrets or confidential or proprietary information
- Refuse to profit from illegally or illicitly gathered information, such as stolen information or information disclosed to you in breach of a confidentiality agreement

AXA XL requires its Representatives to keep all proprietary information and sensitive information received from AXA XL as confidential and to implement controls in order to safeguard this information. No disclosure of confidential information is permitted unless required by law or with AXA XL’s prior consent or in accordance with the terms of a written agreement.

If you become aware of the inappropriate disclosure or use of proprietary information about our customers or business partners or others’ intellectual property, you must inform AXA XL.

### **Protecting AXA XL Information Assets**

Information is one of AXA XL’s most valuable assets. It is important that Representatives acting on AXA XL’s behalf take the necessary steps to protect AXA XL’s proprietary and confidential information from inappropriate disclosure or abuse. Such Information may include:

- Pricing models
- Premium information
- Financial results
- Product information
- Customer lists

Your obligation to protect AXA XL’s proprietary or confidential information continues even after our relationship ends. If you have any questions or concerns as to what may be protected information, or your own duties in respect of such information, please contact your AXA XL relationship manager.

### **Protecting Client Personal Information**

AXA XL is committed to safeguarding any confidential or personal data provided by individual customers, claimants, business associates and others. This information may include, for example, name, addresses,

social security numbers, or personal health information. This data should only be collected, processed, transferred, and retained in accordance with applicable law and AXA XL's Information Security and Data Privacy measures. You must have in place appropriate procedures and controls to safeguard confidential and personal information received from, or processed on behalf of, AXA XL. You must never sell or gain advantage from AXA XL data or client data. Further information and support is available from AXA XL. You must also comply with any Information Security and/or Data Privacy related provisions of your agreement with AXA XL and **inform us as soon as practicable of any situation where there has been a data security or data privacy incident or breach.**

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#### **DID YOU KNOW?**

Data privacy laws not only cover more sensitive types of personal data such as medical and financial data, but can potentially apply to any data about individuals. Individuals' email addresses, contact details, preferences, voice and image are all personal data that may be protected by data privacy laws when such data can be linked to an identifiable individual. There are usually additional laws and restrictions that apply to certain categories of more sensitive personal data, including medical data.

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### **Anti-Corruption**

AXA XL requires Representatives acting on its behalf to conduct business with the highest standards of integrity. AXA XL prohibits all bribes and other improper payments.

### **No Commercial Bribery**

AXA XL's prohibition of bribery extends beyond dealings with public officials. You also must never, in your work for, or on behalf of AXA XL, engage in conduct that constitutes, or may constitute, any form of bribery. This means you should never offer or provide anyone something of value — including cash, cash equivalent, gift, hospitality, meal, travel, loan, discount, reimbursement, contribution, donation, commission, fee, job or internship, contract or service — in return for an improper advantage, such as obtaining or keeping business. For example, you cannot return a sum to someone, already paid by that person's employer, as a reward for making or fostering business arrangements. This is a "kickback" and is prohibited.

In addition, just as you must never offer or provide a bribe or improper inducement, you must never accept a bribe or improper inducement. Note that payments made indirectly through a third party e.g. an intermediary or consultant are subject to the same restrictions and it is your responsibility to understand what activities are being undertaken on your, and ultimately AXA XL's, behalf.

### **Bribery involving Public Officials**

In compliance with global anti-corruption laws, you must never bribe or attempt to bribe a public official when working for, or on behalf of, AXA XL. A public official can be a federal, state or local government officer or employee; an employee of a public international organization; a holder of, or candidate for, public office; an official of a political party; a member of the judiciary, or a member of a royal family. For purposes of this Code and some anti-corruption laws, public officials can also include employees, officers and directors of government owned or controlled companies. You should never offer, or provide something of value, to a public official in order to improperly obtain or keep business, or to obtain any sort of improper advantage, or to try to improperly influence the public official's decisions. In addition, you must not use a third party to engage in such activity on our behalf. You must also refrain from bribery or attempted bribery of agents, friends, or family members of public officials.

### **Gifts and Hospitality**

In some instances, certain gifts and/or hospitality can be viewed as a form of bribery, inducement, or corruption. If you are ever in a situation where you are considering either accepting anything more than a nominal or token gift from, or offering this to, a third party and it somehow pertains to your relationship

with AXA XL, you must first discuss this with your relationship manager. In relation to any form of hospitality that could somehow be associated with AXA XL, whether being offered or received, it must never be excessive, inappropriate or imply any form of illegal or unethical behavior or give the appearance of impropriety.

### **Facilitation Payments**

A facilitation payment is usually a small cash payment made to expedite or guarantee a routine non-discretionary process—the provision of utility services, for example. Some countries permit these, others do not. AXA XL prohibits facilitation payments. You should immediately report any actual or suspected facilitation payments, or requests for such payments arising from any AXA XL related activity.

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**Q:** I am working on a property claim arising from a fire at a warehouse. Before I can agree whether payment should be made under the policy, I need to receive an official report regarding the cause of the fire from the local fire department. It has already taken a significant amount of time for this report to be prepared. I have been informed that the report will be provided more promptly if I provide a donation to the department's charity fund. Should I do this?

**A:** No. Any payment such as this could be regarded as a "facilitation" payment, which is a payment to a government official to perform an existing duty and is not permitted under AXA XL policy. You must refer all such requests to AXA XL.

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### **Anti-Money Laundering**

AXA XL is committed to the prevention and detection of financial crime, including money laundering. Therefore, when conducting AXA XL business, you must not enter into transactions involving funds from illegal activities. Furthermore, you must:

- Comply with all applicable and relevant anti-money laundering laws;
- Only do business with persons who are engaged in legitimate and lawful business activities and whose true identity is known;
- Report any suspicious activity to AXA XL, as well as relevant regulators when required under applicable laws (but not alert the third party when doing so).

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**Q:** A client insures his office premises and equipment with AXA XL and pays his premium promptly from his business account. A month after his policy incepts, he cancels the policy and asks that the return premium be paid to his personal account. What should I do?

**A:** This type of activity may indicate money laundering or fraud. You must report any and all suspicions to your own compliance department and to AXA XL who will advise on appropriate course of action

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### **Trade and Export Control Regulations**

When acting on AXA XL's behalf, you must adhere to all international trade sanctions, restrictions, and export controls applicable to (re)insurance.

You must ensure you are acting within the terms of applicable licenses and obtain all necessary licenses and permits and pay all proper duties and taxes. You must also perform appropriate due diligence and ensure trade sanctions and regulations on your, and AXA XL's behalf, are not breached.

Consequences for violating trade restriction laws and regulations can be severe for your Company, AXA XL, and the individuals involved. Violations can result in penalties including loss of licenses and civil and criminal penalties.

### **Economic Sanctions**

Economic sanctions may affect AXA XL's business and operations. These matters are often complex and subject to frequent change. For example, some sanctions may (1) forbid issuance of (re) insurance and other business relating to particular countries, governments or sectors and / or (2) forbid issuance of (re)

insurance and other business relating to “blacklisted” entities or individuals. Sanctions measures are imposed by various authorities worldwide, including the United Nations, the Office of Foreign Assets Control in the United States, the European Union and any other relevant national authority which has the power to impose economic sanctions.

When conducting business on AXA XL’s behalf, all Representatives must comply with applicable international sanctions laws and regulations. You must never conduct business, including the provision of coverage or payment of any funds, on AXA XL’s behalf, to individuals, entities or countries that are subject to economic sanctions. All necessary checks must be performed to ensure compliance with applicable economic sanctions regulation in accordance with the terms of our agreement with you. If in doubt, seek guidance from your usual AXA XL relationship manager or email [legalcompliance@axaxl.com](mailto:legalcompliance@axaxl.com).

AXA XL also maintains its own **Sanctions & Arms Watchlist** that is usually referred to in the written agreement with Representatives who act in an underwriting or claims related capacity. AXA XL requires all Representatives transacting AXA XL business (including the payment of claims) associated with any of the following countries to **seek prior approval** in accordance with the terms of the written agreement:

<https://axaxl.com/-/media/axaxl/files/pdfs/sanctions-watchlist--external-for-third-parties.pdf>

This list may change from time to time. Please refer to your usual point of contact at AXA XL for updates.

Finally, **you must contact AXA XL for approval in respect of ANY transaction involving military goods or equipment**, regardless of territory, unless arrangements for the provision of such coverage have already been agreed in advance by AXA XL.

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**Q:** I’ve been approached to insure a risk in a location I believe may be subject to economic sanctions and/or trade and export control regulation. The client is pressing me for a response. What should I do?

**A:** Do not proceed without consulting and gaining approval from your compliance department and AXA XL if it involves a Watchlist country. Whether you may insure the risk on AXA XL’s behalf is dependent upon a number of factors.

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## Reporting Financial Crime

If you have any concerns or suspicions relating to financial crime that may, for example, include sanctions, bribery, money laundering, fraud (including fraudulent claims), or tax evasion (depending on the jurisdiction), you must contact AXA XL who will consider what action to take.

## Anti - Boycott

Because of AXA XL’s US operations, Representatives acting on AXA XL’s behalf must follow US anti-boycott laws that prohibit us from participating in unsanctioned boycotts. You should not comply with any request to take action, including requests to supply information, if the request relates, or may relate, to a boycott. Boycott related requests may be difficult to identify. If you are unsure whether you have received a boycott related request, contact your AXA XL Representative manager for guidance before you act.

## Conflicts of Interest

Representatives must always act in the best interests of AXA XL and in the best interests of its customers. This means making sound, unbiased business decisions, regardless of personal or familial involvements, and avoiding any actual or perceived conflict of interest between personal and professional relationships that may make it difficult to meet responsibilities effectively and objectively.

AXA XL Representatives must avoid relationships, arrangements, or behavior that could improperly influence, or appear to improperly influence, business decisions, or be detrimental to AXA XL or its customers, or contravene any applicable law or regulation. Conflict of interest concerns can often be resolved and managed once they are disclosed and discussed – for example in relation to remuneration.

\*\*\*\*\***The key to dealing with a potential conflict is full disclosure and discussion**\*\*\*\*\*

### **Accurate Books and Records**

Our Representatives have a duty to ensure that all AXA XL records accurately reflect AXA XL's transactions, the results of our operations and financial position, and comply with all applicable legal requirements. You must report all concerns relating to accounting, auditing, disclosures, record management, or fraud within or against AXA XL to AXA XL through the Speaking Up tool or by contacting [legalcompliance@axaxl.com](mailto:legalcompliance@axaxl.com).

AXA XL retains the right to audit the activity and records of Representatives acting on its behalf in accordance with the terms of the agreement between both parties.

### **Accurate and Honest Accounting**

To operate with transparency and integrity, when acting on AXA XL's behalf, you must ensure compliance at all times with all accounting policies and applicable laws, rules and regulations. To do so, you must accurately record all assets, liabilities, revenues and expenses, and transactions in relation to business conducted on behalf of AXA XL. You may never make false, misleading or artificial entries, or establish unsupported reserves or accruals.

### **Financial Controls**

AXA XL maintains a comprehensive financial reporting process to support internal management decision-making needs and to meet external filing and disclosure requirements. Our financial controls help ensure that information provided to stakeholders is accurate, complete, objective, relevant, timely and understandable. This means Representatives acting on AXA XL's behalf must maintain an internal control system over the financial reporting process that meets our high professional standards.

You must immediately report any accounting or auditing irregularities related in any way to AXA XL.

### **Fraud Prevention**

AXA XL's reputation depends on the integrity of our actions, and those of our Representatives, and we are firmly committed to the prevention and detection of theft and fraud. Acts of fraud may include the intentional concealment of facts with the intent to deceive or mislead others. Fraud may also include:

- Misstatements arising from fraudulent financial reporting (such as improper revenue recognition, overstatement of assets or understatement of liabilities)
- Misstatements arising from misappropriation of assets (e.g., wire fraud, fictitious vendors)
- Expenditures and liabilities for improper purposes
- Fraudulently obtained revenue and assets, or the fraudulent avoidance of costs and expenses
- Theft of premium

AXA XL has created an environment intended to prevent, detect and mitigate the risk of fraud. You are encouraged to bring to the attention of AXA XL any opportunities or motives for fraud not adequately covered by existing controls. Any concerns regarding fraud or financial irregularities must be brought to the immediate attention of AXA XL through the Speaking Up hotline or by emailing [legalcompliance@axaxl.com](mailto:legalcompliance@axaxl.com). Potential claims fraud identified by our Representatives should be handled in accordance with the terms of our written agreement.

### **Records Management**

Managing our records is a critical component to building trust with our clients, regulators and shareholders. Such records include all email, electronic records, imaged and paper documents that are created received and retained as evidence or information used by AXA XL for legal, regulatory, accounting, or business purposes. All Representatives acting on AXA XL's behalf must comply with the terms of the written agreement between us in respect of records management.

## Corporate Social Responsibility (CSR)

AXA XL realizes how important it is to contribute to the communities in which we operate. AXA XL supports many initiatives and programs that support our communities around the world.

If AXA XL Representatives wish to partner with us on CSR related activities, you should discuss with your relationship manager.

AXA XL also supports and respects efforts to protect human rights and to advance environmental sustainability.

- We ensure that all our employees, and others acting on our behalf, work of their own free will
- We do not accept corporal punishment, forced labor, involuntary labor, or other forms of mental and physical coercion. We do not use, or permit the use of, child labor
- We work with business partners and suppliers who share our standards and commitment to human rights
- We are proactive and look for ways that we can reduce waste, and use energy more efficiently

## Always report anything that could compromise your well-being or that of others

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**Q:** I overheard a colleague making inappropriate remarks about an AXA XL customer's claim and possibly sharing outside the office. What should I do?

**A:** Personal information must be strictly safeguarded. Inappropriate sharing of such information is a violation of AXA XL policy and a breach of trust. You should raise this issue with the appropriate management personnel. If you are uncomfortable raising this issue with management, then report the matter to [legalcompliance@axaxl.com](mailto:legalcompliance@axaxl.com) or use AXA XL's Speaking Up hotline.

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## Communications and Marketing

You must not make public statements or advertise on AXA XL's behalf unless this is within the terms of our written agreement. All marketing materials referencing AXA XL must be approved.

## Analyst, Media and Regulator Inquiries

If a securities analyst, journalist, or regulator formally or informally requests information from you, you must not speak on AXA XL's behalf without authorization. Refer all enquiries to [legalcompliance@axaxl.com](mailto:legalcompliance@axaxl.com).

# Conclusion

AXA XL will only engage with Representatives who comply with all applicable laws and regulations and who act with integrity and honesty with us and our customers. AXA XL may seek to terminate its relationship with a Representative who has failed to meet these standards, may take further action to seek damages, and will report misconduct to relevant authorities.

Thank you for your cooperation and attention to these important matters.

# Contact and Reporting Details

Contact	Location	Telephone
<b>Compliance</b>		
<a href="mailto:Toby.Websper@axaxl.com">Toby.Websper@axaxl.com</a> – CCO International	United Kingdom	+44 207 621 4472
<a href="mailto:Karen.Tiroletto@axaxl.com">Karen.Tiroletto@axaxl.com</a> – Senior Manager	United States	+1 860 293 7015
<b>DATA PRIVACY</b>		
<a href="mailto:Iris.Lanher@axaxl.com">Iris.Lanher@axaxl.com</a> – Chief Data Protection Officer	France	+33 156 928 457
<a href="mailto:Brendan.McKiernan@axaxl.com">Brendan.McKiernan@axaxl.com</a> – North American Data Privacy Officer	United States	1 860 293 6288
OR EMAIL <a href="mailto:legalcompliance@axaxl.com">legalcompliance@axaxl.com</a>		

## SPEAKING UP / WHISTLEBLOWING TOOL

[www.axaxl.com/speakup](http://www.axaxl.com/speakup)