

**AXA Group
UN Global Compact Communication on Progress 2009-2010**

Company Name	AXA Group	Date	November 2009
Address	25 avenue Matignon, 75008 Paris, France.	Membership date	2003
Country	France	Number of employees	135,901 (year end 2008)
Contact name	Sylvain Vanston	Contact Position	Corporate Responsibility

UNGC Statement of support

Mr. Henri de Castries, Chairman of the AXA Group Management Board and Chief Executive Officer, has renewed his support of the Global Compact's 10 principles in the following statement: *"I renew AXA's commitment, undertaken at the time of our 2003 endorsement, to respect the UN Global Compact's 10 principles for the upcoming year"*.

About the AXA Group

The AXA Group is a worldwide leader in Financial Protection. AXA's operations are diverse geographically, with major operations in Europe, North America and the Asia/Pacific area. For full year 2008, IFRS revenues amounted to Euro 91.2 billion and IFRS underlying earnings to Euro 4.0 billion. AXA had Euro 981 billion in assets under management as of December 31, 2008. The AXA ordinary share is listed on compartment A of Euronext Paris under the ticker symbol CS (ISIN FR0000120628 – Bloomberg: CS FP – Reuters: AXAF.PA). The American Depository Share is also listed on the NYSE under the ticker symbol AXA. AXA is included in the DJSI, FTSE4GOOD and ASPI EUROZONE "Socially Responsible Investment" indexes.

Corporate Responsibility at AXA

AXA's strategy is to place Corporate Responsibility both at the heart of its business as well as its day to day interactions with its stakeholders. It is through adopting a responsible behaviour, as well as through sustainability added-value products and services, that the Group is able to most effectively participate in social, environmental and economic progress.

The following selection of diverse initiatives from diverse regions illustrates our commitment to uphold the UN GC's four themes (human rights, labour standards, environment, anti-corruption). These have been collected throughout 2009 at Group level and among our local affiliates.

Note: 2009 social and environmental data was not yet published at the time of this document's drafting, hence the 2008 figures at Group level.

Human Rights

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights
- Principle 2: make sure that they are not complicit in human rights abuses.

As a financial services company, many of our human rights impacts on society are linked not to our own "production" processes or our own workforce, but to our choice of suppliers. In making these choices, we integrate human rights criteria in the selection and management of our suppliers.

Actions recently implemented



GROUP – Supply chain screening. A major buyer of products and services, AXA has extensive purchasing power and can extend its CR influence notably via the integration of social and environmental criteria into the process of selecting its suppliers. The Group Procurement team has defined and implemented tools to that effect (code of conduct, guidelines, questionnaires, and a contractual clause formalizing the supplier's respect for human rights, based on the ILO conventions). In 2008, the sustainable development clause was enforced with 81% of the Group level suppliers. An in-depth analysis of the sustainable development performance of around fifty suppliers was carried out in 2008, with the aim of improving their practices.

GROUP – Responsible investment. AXA has monitored closely the evolving consensus in international conventions and law with respect to certain weapon types. The withdrawal of AXA's investments (for own account) in businesses involved in the production or the sale of cluster bombs was completed in 2008, at the same time that the Oslo Convention on the prohibition of cluster bombs was being signed by a number of governments around the world. This initiative followed the decision to divest from companies involved in the production or the sale of anti-personal landmines, based on the Ottawa Convention which bans such weapons. In doing so, AXA substantiates its commitment to act as a responsible investor in line with new international guidelines.

Results or outcomes

For case study-specific data, please refer to above texts.

GRI3, Financial Services Sector Supplement correspondence key:

- HR2, "Percentage of significant suppliers that have undergone screening on human rights"

Labour Standards

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labour;
- Principle 5: the effective abolition of child labour; and
- Principle 6: the elimination of discrimination in respect of employment and occupation.

AXA strives to be a responsible employer, placing employee engagement at the heart of its business strategy. Achieving this means creating a workplace built on AXA's Values that fosters diversity and equal opportunities for all, promotes employee participation, encourages professional development, and supports employee well-being.

Actions recently implemented

> Employee representation

EUROPE - AXA has set up a European Works Council (EWC), an employee representation body whose extensive role goes beyond regulatory requirements. The EWC is made up of staff representatives from AXA's largest European subsidiaries, who meet in order to receive and exchange information on the social, strategic and economic issues that concern the Group, and maintain an ongoing dialog between employees and the management. The collective agreement on such issues between AXA and the EWC has been renewed in 2009 and is publicly disclosed (www.axa.com). In particular, the agreement includes detailed provisions related to the handling of restructuring.

INDIA - AXA Business Services has provided for an Ombudsman who investigates complaints and facilitates fair settlements between aggrieved employees and the organisation. The Ombudsman is a person of repute and expertise who functions outside the organisation's hierarchy in order to provide an independent avenue of grievance redressal.

> Child labor / forced labor



The main risks associated with child or forced labor in the financial services sector are located in our supply chain. As a consequence, see Principle 2 above ("complicit" human rights abuses).

> Diversity & equal opportunities

FRANCE - For several years now, AXA France has been a recognised leader in the area of equal opportunities through the promotion of a number of initiatives such as: the "Plan Espoir Banlieues" (active recruitment in disadvantaged suburbs), the "Train pour l'emploi et l'égalité des chances" (a diversity-oriented recruitment roadshow), and the "Charte de la Parentalité" (a recognition of the role of fatherhood in work life balance). AXA France also published an internal guide on the issue, and has a dedicated budget - 1.25 million euros over 3 years - to address gender-based pay gaps.

GERMANY - AXA Germany signed a specific agreement with its Works Council, which also represents all disabled employees at the company. Specific facilities accessible for the handicapped are now provided, such as adapted elevators, even floors and doorsteps, special rest room facilities and ramps. Furthermore, the workspace is modified if an employee needs special arrangements due to a personal handicap.

TURKEY - AXA Sigorta signed the declaration of women in management initiative of KalDer (an independent non-profit) in March 2009, the latest declaration of women's rights to govern. The level of female representation on the company's executive committee is relatively high (three women and four men), and the percentage of female managers (44%) is significantly higher than the Turkish average and that of many other European countries. Women and men are also treated equally in terms of salaries.

USA - AXA Equitable created the Office of Diversity and Inclusion to emphasize and build upon their commitment to creating a workplace that is diverse, inclusive and unique. Many events are hosted by the organization during the year to highlight diverse cultures. The Diversity and Inclusion Advisory Council, comprises 12-15 individuals from a variety of business areas and locations to support and advise senior management in driving business excellence through diversity and inclusion. Characteristics that make people unique are valued as essential to AXA goals of growing the business, serving clients, delivering long-term value to the shareholders and the community at large.

Results or outcomes

For case study-specific data, please refer to above texts.

Employee representation :

- 2008: At least 53.5% of the Group's employees are covered by the European Works Council's framework agreement. It is likely that other non-EWC AXA affiliates have developed social dialogue / freedom of association agreements, but these are not monitored at Group level.

Diversity & equal opportunities - proportion of women in workforce per category:

- Senior executives: 20%
- Managers: 32%
- Overall average: 58%

GRI3, Financial Services Sector Supplement correspondence key:

- Employee representation : LA4, LA5
- Diversity & equal opportunities : LA13

AXA Group social data reporting 2008 :

- <http://www.axa.com/lib/en/library/refdoc/sd/2009/5490.aspx>



- Principle 7: Businesses should support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote greater environmental responsibility; and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies.

AXA is committed to protecting the environment by improving its own environmental footprint, but also through the very conduct of its insurance and investment business. This "indirect" effort seeks to reduce the environmental footprint of our millions of clients throughout the world by developing new or adapted "green" insurance or investment products and services. This involves leveraging the Group's P&C insurance and asset management activities in order to encourage "responsible" environmental practices by our insured clients and investment portfolio companies.

Actions recently implemented

> Group commitments

GROUP - AXA has signed or adhered to numerous international collaborative initiatives linked to environmental protection. In 2009, AXA signed the Kyoto statement of the Geneva Association, a major commitment of the world's largest insurers, attesting the deep concern of climate change and its consequences for the insurance industry. AXA signed the United Nations' "Caring for Climate", a voluntary action platform for companies that seek to demonstrate leadership on the issue of climate change. AXA also partners with the Carbon Disclosure Project, an investor coalition on climate change, as well as other organisations on a local basis.

> Direct environmental footprint management

GROUP - The Group aims to reduce the company's direct impact on the environment, rally employees around a common environmental protection culture, comply with certain legal reporting requirements, and meet the expectations of environmentally concerned investors. Within this framework, priority Group-level objectives have been mapped out in AXA's 2007-2009 strategic plan, with the 2007 baseline year: energy consumption, CO2 emissions and water consumption are to decrease by 5% by 2009, and paper consumption is to decrease by 2.5%. AXA publicly discloses its results in the Annual Activity and Sustainable Development report. AXA is currently defining a new set of targets beyond 2009.

GROUP - Determined to reduce the environmental footprint of its computer infrastructures, AXA Technology Services, the Group's IT subsidiary, rolled out an action plan in 2008-2009 that is largely inspired by its affiliation with the Climate Savers Computing Initiative, the environmental standards benchmark for all computers, screens and printers. In 2008, the replacement of fixed (desktop) computers allowed the Group to save 3,560 tons of CO2 (and 400,000 euros), while the virtualization of servers saved 8 million kWh (and 500,000 euros).

FRANCE - AXA France, in order to celebrate the 2009 European Mobility Week, has unveiled a new car fleet policy. Directors are not allowed to order cars whose CO2 emissions exceed 200g / km, and they have the possibility to purchase a Toyota Prius hybrid vehicle – the only non-European car in the catalogue. The affiliate also launched a car-sharing website open to all employees, which helps to reduce the carbon footprint of employee commuting. In addition, AXA France's profit-sharing agreement now includes an environmental footprint target.

FRANCE - The AXA Group headquarters includes criteria related to local carbon emissions reductions in the calculation of its profit-sharing agreement. This agreement, concluded with the local employee representatives, defines CO2 emissions targets relative to the headquarters' perimeter. The carbon footprint criteria represents 10% of the profit sharing agreement.

AUSTRALIA - AXA Australia has set itself a goal to reduce its electricity consumption by 20 per cent, water usage by 10 per cent and office paper consumption by 2.5 per cent by the end of 2009, with a 2006 baseline year. These targets have been achieved one year ahead of schedule. A new set of targets is being developed.



BELGIUM - AXA Belgium developed an ambitious responsible building investment policy: when it reinforces its building park it addresses several environmental issues. It strives to acquire buildings which are for example located near major public transportation hubs or has installed solar panels on certain buildings. AXA Belgium conducts also “green renovation” work on existing buildings. For example, the Berchem / Anvers site has reduced its electricity and gas consumption by 31% and 51% respectively with such renovations.

SPAIN - Since April 2009, AXA Spain started using a much shorter version of its car insurance policy to be signed and returned by customers. The previous document contained 16 sheets, while the new version is only one sheet long. The savings are estimated at 580 tons of paper. Once implemented in 100% of insurance products, AXA will save 900 tons of paper and approximately 420,000 € per year. The new AXA headquarters in Madrid incorporates environmental management issues: paper, plastic and other waste segregation processes oriented to recycling; more efficient illumination and air conditioning practices and equipments, etc.

SWITZERLAND - AXA Winterthur has developed a comprehensive environmental strategy focused on climate protection and sustainable use of resources. A 5% CO₂ emissions (from business trips) reduction target has been set for 2008-2009. A brochure on environmentally friendly business travel was published. AXA Winterthur has about ten video conference rooms, it uses AXA bikes / electric bikes and received an award for promoting the use of bicycles in its operations. AXA Winterthur is a member of a group of companies that has undertaken to increase its energy efficiency by 17% by 2012 compared to 2000. AXA Winterthur uses only Swiss hydroelectricity and has a partnership with a wind power station.

UK - AXA PPP Healthcare UK is the first in its sector to win ISO 14001 certification for Environmental Management from the British Standards Institute. Innovations range from enhancing the energy efficiency of buildings to generating renewable electricity from on-site solar panels and solar powered car park lights. Electric delivery vans have also been introduced to distribute internal mail between AXA sites. Innovations across the board have reduced the overall amount of paper used by over 22% (2.1 million sheets in just a year). The use of recycled and mixed Forest Stewardship Council (FSC) accredited paper was ramped up to over 50%, and is now on course for 80%.

UK - AXA UK has set itself environmental footprint reduction targets, in addition to the Group targets. Priorities include reducing energy consumption across UK sites by 20% by 2012 (baseline year: 2006). AXA UK seeks to explore environmental impact reduction and cost savings through IT power consumption management, reduced water consumption and waste production, while also preparing for the UK Government’s Carbon Reduction Commitment, which will come into force in 2010.

UK - AXA UK launched the “Cut a kilo for World Environment Day” event to celebrate the annual UN initiative aimed at promoting worldwide environmental awareness and action. AXA UK developed an extensive communications package with numerous tangible hints and tips to help employees “kick the CO₂ habit” at work, at home, when travelling or when shopping.

USA - To provide environmental leadership, AXA Equitable has established an Environmental Sustainability Council (ESC) that reaches across business units and locations to raise awareness and coordinate action around environmentally responsible initiatives. The Environmental Sustainability Council instills environmental responsibility as a corporate value by understanding issues, sharing information and recommending sound practices to improve the environmental performance of AXA Equitable.

> Sustainability-linked insurance products & services

GROUP - To enable Group entities to underwrite innovative risks in the area of green energies, the AXA Technical Innovation Pool (TIP) has come up with an in-house reinsurance solution. The pool offers an alternative for covering risks that would be refused by traditional reinsurance companies, involving onshore or offshore wind turbines, geothermal, solar and biomass power plants, in the construction, assembly and operational phases. The capacity of the Pool, adapted to this particular type of risk, represents the sum of the contributions of each participating AXA subsidiary. The TIP



contributes to the goal of leveraging and sharing AXA's expertise in the field of renewable energy, thus helping promote their development.

INDIA - With Bharti AXA IM's "Eco Plan", investors opting for the paperless Eco Plan not only receive electronic account statements, newsletters and fact sheets by email, they also benefit from the savings on print and stationery, which are passed in the form of reduced annual expenses - 25 basis points lower than the regular plan (annual expenses of 2.5% while the Eco Plan charges 2.25%).

FRANCE - The Energies Nouvelles ("new energies") pack helps homeowner insurance policyholders - mainly those who own independent houses - who are taking tangible steps to protect the environment. AXA France insures the installed equipment that supplies energies that offer an alternative to fossil fuels: solar or photovoltaic heating panels, geothermal heat pumps, wind turbines. In the event of an insured loss, not only does AXA replace the equipment or compensate the policyholder for the loss, the loss of revenues related to the sale of energy is also covered.

FRANCE - AXA France supports small and medium sized businesses in their quest to manage their environmental impacts. Every business that has obtained at least level 1 certification in the environmental management program offered by the "1.2.3 Environnement" programme qualifies for a 30% reduction in the net annual premium due on its AXA France G.R.E.EN insurance policy covering environmental risks.

FRANCE - AXA France's "Libre Voiture" package is an innovative model whereby customers are offered the use of a rented small, urban, low emissions vehicle during the week (typically for work-home commuting), and a large family car (wagon-type) over the week end or vacations, thereby reducing overall emissions without the need to purchase two cars.

FRANCE - "Green Miles" is an eco-responsible offer is geared toward companies which currently or are soon to equip their vehicle fleets with energy consumption data monitoring systems. In addition to reducing gas consumption, Green Miles gives these companies a rebate on their car fleet insurance. It further helps companies raise awareness among their employees of eco-responsible driving, generating cost reduction, a cleaner environment and greater road safety.

ITALY - AXA MPS Danni's "Ecoenergy" product is an "all risks" cover for individual solar or photovoltaic plants linked with loans. The main guarantees are damages caused by natural events, photovoltaic systems damages, fire, civil responsibility, and even loss of revenue in case of low production.

BELGIUM - AXA Bank Belgium lends a helping hand to borrowers with eco-friendly renovation projects through its energy@home option. Solar panels, new heating systems, double glazing, insulation, and many other green initiatives can be financed via the attractive terms offered under energy@home. To qualify, just half of the total budget for the project must be devoted to sustainable renovation.

CANADA - AXA Canada helps its automotive customers "going green" with its Low Mileage, Hybrid Vehicle and Public Transit Commuting cumulative discounts. Drivers who limit their driving distances up to 10,000 kilometres annually are eligible up to a 10% premium discount. Hybrid vehicles are also entitled to a 10% premium discount. Clients commuting via public transit are offered up to 20% discount. (Discounts varying per entity).

SPAIN - AXA Spain has concluded an agreement with Spain's main electric scooters manufacturer (Vectrix) whereby AXA is the manufacturer's recommended insurer. In exchange for this commercial recommendation, AXA applies a competitive premiums policy to these "green" vehicles, thus promoting their development. AXA Spain also offers four insurance products aimed to answer power and solar energy companies' needs, according to renewable energies trends: Comprehensive Assembly insurance; Damage; Public liability; Goods transport (Photovoltaic new plates, new wind turbines).

SWITZERLAND - AXA Winterthur grants a discount of up to 20 percent on liability and physical damage premiums for cars with low CO2 emissions. The discount is available for insured persons



whose car emits less than 140g/km in CO₂. As the largest Swiss motor vehicle insurer, AXA Winterthur contributes to protecting the environment.

> Responsible investment

EUROPE - Buildings are a major source of greenhouse gas emissions (40% of the total in Europe). As a specialist in the management of real estate assets, AXA Real Estate Investment Managers developed a Responsible Property Investing strategy and co-founded the "Green Rating" project, a European-wide assessment tool that is built around five environmental performance indicators, including energy efficiency and carbon footprint, and that offers European property investors a common analytic grid into buildings' environmental performance. The tool is tested on 15 buildings in various countries, of which AXA REIM owns 4. A 2008 research ranked AXA REIM among the industry leaders regarding the environmental management of real estate assets (Novethic – ADEME, 2007, 2008).

FRANCE - AXA REIM and EDF Energies Nouvelles have developed a solar photovoltaic power station on the roof of an 88,000 m² AXA building. As the most powerful power station of its category, it will contribute to reducing of CO₂ emissions by 244 tons per year.

GROUP - AXA IM has several specialist RI products which include environmental screening. In addition, AXA WF Clean Tech is a fund which invests in companies which develop technologies, products or services having a positive impact on global warming, environment and linked concerns: pollution, over-population, desertification, deforestation, and diminishing natural resources. These companies must be active in renewable energy, water treatment, pollution control and waste treatment or energy efficiency.

> Maximizing opportunities : the key role of research

GROUP - As described above, AXA is investing significant resources in developing and marketing products and services that are both designed to adapt to the effects (eg. flood prevention) and minimise the causes of climate change (eg. low emissions vehicles insurance). In addition, AXA invests significant resources in external and internal research which, among other long term topics, a focus on environmental matters with a view to maximise opportunities and limit risks. These include the following initiatives :

- AXA Research Fund: AXA has committed €100 million over 5 years to support academic research institutions and individuals involved in fundamental research programs in five macro societal trends broadly associated with risk prevention. These include climate change. The AXA Research Fund, one of the most significant privately funded fundamental research project in the world, is AXA's main research initiative. Current endowments and projects can be browsed at <http://researchfund.axa.com/en>
- "Sustainable Finance and Responsible Investment" research program : a partnership between École Polytechnique, Institut d'Économie Industrielle (IDEI) in Toulouse and the Finance Durable et Investissement Responsable association, with the support of the Association Française de la Gestion Financière and the Fonds de Réserve des Retraites. See <http://www.axa.com/en/news/2008/15b8097daw627106t0t6.aspx>
- Risk Foundation : with the support of the academic community, the Fondation du Risque aims to create a center of excellence in research and education in the field of financial and industrial risk management. See <http://www.axa.com/en/news/2007/cac2kk2wf4zccpiv7lpz.aspx> . AXA's Risk Foundation's budget is now included in the AXA Research Fund's budget.
- AXA's Group Risk Management central structure and local network is at the centre of the Group's direct R&D efforts, working both on long term risk trends and new product development.

Results or outcomes

For case study-specific data, awards, etc, please refer to above texts.

Environmental reporting, 2008 Group data (see 2008 Activity & Sustainable Development, p63):



AXA GROUP ENVIRONMENTAL INDICATORS ⁽¹⁾	Unit	2007	2008
Number of employees on site (Full-Time Equivalent, FTEs)	FTE	103,317	121,990
Net internal area (sites)	m ²	2,400,504	2,487,602
Power (sites)			
Power consumption ⁽²⁾	kwh	565,899,760	627,987,507
KPI: Power consumption per person	kwh/FTE	5,477	5,148
2007-2008 evolution			-6%
Transportation			
Business travel: airplane and train ⁽³⁾	km	588,852,537	352,931,708
Business travel: AXA vehicle fleet	km	288,261,087	393,466,688
Home/workplace commute (round trip) ⁽⁴⁾	km	990,579,720	1,258,507,154
CO₂ emissions⁽⁵⁾			
CO ₂ emissions resulting from onsite power consumption	T eq. CO ₂	173,619	225,833
CO ₂ emissions resulting from business travel: airplane and train ⁽³⁾	T eq. CO ₂	197,118	116,907
CO ₂ emissions resulting from business travel: AXA vehicle fleet	T eq. CO ₂	57,598	77,513
KPI: CO₂ emissions resulting from onsite power consumption and business travel (airplane, train, AXA vehicle fleet) per person	T eq. CO₂	4.15	3.44
2007-2008 evolution			-17%
CO ₂ emissions resulting from home/workplace commute	T eq. CO ₂	107,208	133,773
Water			
Water consumption ⁽⁶⁾	m ³	1,070,156	1,263,816
KPI: Water consumption per person	m³/FTE	10.36	10.36
2007-2008 evolution			0%
Paper			
Paper consumption	T	13,583	15,337
KPI: Paper consumption per person	kg/FTE	130	126
2007-2008 evolution			-3%
Percentage of paper recycled and/or guaranteeing sustainable management	%	38	49

Change in reporting perimeter: 19 new countries and numerous new sites have been incorporated into the 2008 reporting perimeter, representing a 29% increase in FTEs covered by the reporting compared to 2007. Of note, Key Performance Indicators (KPIs) are highlighted in bold.

- (1) In 2008, environmental indicators were collected for sites representing 98,918 FTEs and were then extrapolated, continent by continent, to cover all 121,990 salaried FTEs working at the AXA Group as of 31/12/2008. In 2007, this process took place on the basis of data collected from 70,197 FTEs, extrapolated to 103,317 FTEs.
- (2) Electricity, natural gas, fuel, steam and other sources of energy.
- (3) This data has been collected from 88,366 FTEs. The accuracy of the 2007 airplane and train data remains difficult to estimate due to variations in the data communicated by local travel, which resulted in a significant drop in reported travel between 2007 and 2008.
- (4) Home/workplace commute estimations are based on an annual online transportation survey, issued to every AXA salaried employee. This data has been collected from 27,380 FTEs. Sites whose response rate was below 5% have been excluded from the data consolidation process.
- (5) CO₂ emissions estimation: as in 2007, emissions factors specific to every country have been used for electricity, train, air and road travel. These factors are based on standards established by ADEME (Agence de l'environnement and de la maîtrise de l'énergie - France) and the Greenhouse Gas Protocol.
- (6) This data has been collected from 77,616 FTEs. Many sites in Asia and America are not equipped with water meters, which prevents their accurate measurement.

Of note, in 2008, Friends of the Earth France analysed in detail French insurers' responses to climate change during 2008. The NGO focused almost exclusively on product-related initiatives (both insurance and asset management products). The NGO analysed 10 criteria against which all French insurers have been rated according to a transparent methodology. AXA was awarded the #1 position with a score of 18/40.

Anti-Corruption

- Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

AXA's responsibility towards our shareholders includes ensuring the long-term viability of the company through sound and transparent corporate governance and a culture of business ethics, supported by AXA's Standards and Code of Ethics.

Actions recently implemented



GROUP - The AXA Group has had a Group Compliance Guide since 1994. The guide details rules governing the fight against money-laundering and corruption, information on the Group's procurement policy, and on the attitudes that are consistent with AXA's values. If an employee believes that a practice is incompatible with the principles set forth in the compliance guide, including issues related to corruption, he or she is asked to report it. The defense of all employees is ensured by the Group, whether they are the whistleblower or the alleged perpetrator. As the fight against money laundering is also a key issue in the insurance industry, the Group has drafted special guidelines and created an Anti-Money Laundering Officers network. In 2009, AXA developed a Compliance training module for all employees, to be gradually implemented.

SPAIN - Since March 2009, AXA Spain employees' e-learning includes training on the Compliance and Ethics Guide. The aim is twofold: contributing to greater awareness on professional conduct, and supporting learning to such case studies.

Results or outcomes

Not applicable to quantitative reporting.

How do you intend to make this COP available to your stakeholders?

- Our CoP is primarily intended to be browsed publicly on the UN Global Compact's dedicated website (http://www.unglobalcompact.org/COP/cop_search.html?detail=AXA).

In addition, this COP is integrated or highlighted into our existing communications with our stakeholders:

- Corporate website, section describing our commitment to support the UN Global Compact : <http://www.axa.com/en/responsibility/strategycommitments/commitments/localandinternationalcommitments/>
- Annual Activity & Sustainable Development report: <http://www.axa.com/en/publications/annualreports/archives/>