

**AXA Group
UN Global Compact Communication on Progress 2010-2011**

Company Name	AXA Group	Date	November 2010
Address	25 avenue Matignon, 75008 Paris, France.	Membership date	2003
Country	France	Number of employees	128,358 (year end 2009)
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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

AXA Group is a worldwide leader in insurance and asset management, with 216,000 employees (including exclusive distributors) serving 96 million clients in 57 countries. For 1H10, IFRS revenues amounted to Euro 49.9 billion and IFRS underlying earnings to Euro 2.1 billion. AXA had Euro 1,089 billion in assets under management as of June 30, 2010. The AXA ordinary share is listed on compartment A of Euronext Paris under the ticker symbol CS (ISN FR 0000120628 – Bloomberg: CS FP – Reuters: AXAF.PA). AXA's American Depository Shares are also quoted on the OTC QX platform under the ticker symbol AXAHY. The Group is included in the main international SRI indexes, such as Dow Jones Sustainability Index (DJSI) and FTSE4GOOD.

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 and 2010 at Group level and among our local affiliates.

Note: AXA's 2010 social and environmental data was not yet finalised at the time of this document's drafting, hence the 2009 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 direct "production" processes or our own workforce, but indirectly through our choice of suppliers or investment policies. In making these choices, we integrate human rights criteria in the selection and management of our suppliers, as well as in our investment policy.

Actions recently implemented



GROUP – Supply chain screening. AXA is a major purchaser of products and services for the purpose of its internal operations and services provided to policyholders. This significant volume of purchases, for a total value of exceeding €11 billion in 2009, opens up an additional field of action for the Group in promoting human rights. The Group applies social and environmental criteria to select its suppliers and assess their performance, in order to improve service quality and reduce supply chain risks. A “Corporate Responsibility clause” requiring suppliers to make a formal commitment to uphold ILO principles is included in 84% of Group’s contracts with suppliers in 2009. Since 2008, AXA has assessed, with the assistance of a specialized service provider, an in-depth analysis of the Corporate Responsibility performance of approximately 150 local and group suppliers. The goal of this analysis was to identify the main risks and give suppliers a tangible incentive to improve their practices. A new evaluation has been realized for suppliers at risks and 76% of them have shown significant progress. Since 2009, buyers objectives include CR performance follow-up of already assessed suppliers. In addition, the Group Procurement department developed a matrix to assess sustainable development risk and opportunities for each purchasing category. Thanks to this tool, purchasers have a detailed view of the stakes involved for each supplier and can prioritize their improvement plans.

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 also has set up a European Works Council (EWC), whose extensive role goes beyond the regulatory requirements in force. 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 management. In June 2009, the Group EWC agreement (available on www.axa.com) was renewed for an indefinite term starting December 1, 2009. This renewal takes into account the European Directive n° 2009/38 dated May 6, 2009 . The initial agreement was concluded before the



European directive on works councils became mandatory. In this way, staff rights to be consulted and informed were freely agreed on by management and employee representatives before the directive's compulsory provisions actually came into effect. AXA holds two plenary meetings a year, in combination with a preparatory and post-plenary session systematically held for debriefing. These plenary meetings are always attended by the chairman of the Group's management board. Moreover, the EWC's bureau, which features ten representatives, meets monthly. The introductory section of this agreement is based on a number of international benchmark documents, such as the UN's Declaration of Human Rights and the International Labor Organization's standards, as well as AXA's own set of core values and commitments. In addition to the EWC's work, numerous collective bargaining agreements are signed. For example, in France, 14 collective agreements have been signed throughout 2009.

Headcount adjustments and related measures

The aforementioned Group EWC agreement provides a certain number of commitments to employees in the event of major organizational changes with impacts on jobs. AXA has developed a number of principles with a view to guiding its various European business units in their local management. These include the following:

- When organizational changes affect jobs, AXA pledges to supply relevant information and, as appropriate in light of local cultures and obligations, to consult with employees and their representatives. In connection with this information-gathering and consultative process, the data and information provided by AXA will include possible alternative solutions if relevant.
- AXA will do its utmost to prevent compulsory redundancies and other collective transfers, by pursuing other approaches whenever possible. More specifically, AXA endeavors to : 1) Seize the opportunities offered by natural headcount attrition to facilitate employment issues; 2) Make every effort to help employees analyze their skills and career paths and offer them training and reassignment opportunities; 3) Give priority to voluntary departures and redeployments instead of redundancies and other forms of collective transfers; and 4: Deal with decisions of international transfer of business (for example in the case of offshoring) applying the principles of social dialogue explained in this text to the European countries involved..
- AXA pledges to recognize staff representatives and uphold their freedoms, rights and functions, in line with national legislation and, where relevant, agreements in force in local business units. Similarly, AXA will not discriminate against its staff on the basis of their gender, race, color, ethnic origin, genetic makeup, disabilities, sexual orientation, language, religion, personal convictions, union membership or political opinions.

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 trusted expert 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

Gender equality in the workplace

GROUP - Diversity and Inclusiveness at AXA means acknowledging and respecting individual differences, recognizing and appreciating multiple backgrounds, cultures and perspectives and building on the unique contribution and merit of each and every one of its employees, regardless of physical attributes or group identity. A diverse workforce helps AXA effectively meet diverse market and customer needs globally and locally, as well as improve its competitiveness through innovation. It also helps attract the most talented people in all populations and foster internal morale and engagement, without ignoring the benefits of enhanced people management and optimized teamwork. Moreover, it enhances the brand image. In 2009, significant progress has been made with the senior sponsorship of a member of the Management Board. At the entity level, 47 Diversity Champions have been appointed and are supported by Diversity Correspondents who implement action plans. A



Group Diversity Council was formed in February 2010, together with the appointment of a Group Chief Diversity Officer in 2010.

MISC. AFFILIATES - AXA's local entities have developed numerous diversity-related initiatives. 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. AXA Sigorta (Turkey) signed the declaration of women in management initiative of KalDer (an independent organisation aiming to enhance awareness of management quality) in March 2009. At AXA Sigorta, the executive committee is composed of 3 women and 4 men, the percentage of female managers (44%) is significantly higher than the Turkish average and that of many other European countries. AXA Equitable (USA) 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.

Hiring and integrating the disabled

MISC. AFFILIATES - Beside the aforementioned gender-based inclusion policies and practices, AXA entities also promote the integration of disabled employees. The number of disabled employees increased by 2,8% over 2008, especially in Ukraine, France and Spain. For example, 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. AXA France's "Mission Handicap" enables 780 employees to benefit from adapted working schedules, transportation and real estate services. These efforts also apply to the parents of handicapped children.

Results or outcomes

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

Employee representation :

- 2009: At least 51% 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 and Managers: 34.5%
- Overall average: 50%

GRI3, Financial Services Sector Supplement correspondence key:

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

AXA Group social data reporting 2009 :

- http://www.axa.com/lib/en/uploads/acr/group/AXA_Rapport_Activite_2009_VAb.pdf

Environment

- 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. These include the following:

- "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.
- United Nations' "Caring for Climate", a voluntary action platform for companies that seek to demonstrate leadership on the issue of climate change.
- Partner with the Carbon Disclosure Project, an investor coalition on climate change.
- Global Investor Statement on climate change, UNEP FI, 2009 and 2010.

> Direct environmental footprint: target setting, reporting and certification

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, in 2009, AXA set new quantitative targets for its Key Performance Indicators (KPIs) related to energy, CO2 emissions, paper and water consumption for the 2008-2012 period:

- Power consumption (kWh/Full Time Employee [FTE]): 20% reduction.
- CO2 emissions (T eq. CO2/FTE): 20% reduction.
- Water consumption (m3/FTE): 15% reduction.
- Paper consumption (kg/FTE): 15% reduction.

All of these targets are monitored on a regular basis and reported on annually so that local entities can gradually implement their own action plans in order to achieve these goals.

The environmental reporting process embraces 41 countries over five continents. The scope of the 2009 annual environmental reporting included 268 operating sites, covering 82% of the AXA employees, which is considered adequate to represent the Group's overall performance.

Certification and evaluation. PricewaterhouseCoopers Audit, one of AXA SA's Statutory Auditors, reviewed the environmental reporting process (Environmental Protocol, reporting tool, organization), as well as the data and collection processes of four significant European countries. The auditors' statement of assurance is included in the Activity and Corporate Responsibility Report. In 2009, 34 sites were reported to have an environmental certification.

> Direct environmental footprint management

GROUP, MISC. AFFILIATES

Power consumption

AXA's power consumption per FTE decreased by 7% in 2009 compared to 2007. The proportion of renewable energy consumed by AXA's premises is 23%. AXA's premises use electricity (80% of floor space), gas (15% of floor space) and fuel / steam (5% of floor space).

These reduction trends demonstrate the development of local measures to reduce the Group's energy and carbon footprint. These include for example the rolling out of a "Green IT" strategy by AXA



Technology Services, the Group's IT subsidiary, affiliated with the Climate Savers Computing Initiative (an environmental standards benchmark for all computers, screens and printers). AXA Australia has rationalised energy use and set itself stringent targets, in addition to the Group targets. AXA Belgium has installed solar panels on certain buildings and conducts "green renovation" work on existing buildings. AXA Germany's headquarters in Cologne re-uses heat produced by the central IT system for central heating, while in the summertime the central ventilation is cooling the office areas. AXA Business Services (India) uses compact fluorescent lamps and motion sensors to control lighting and appliances, and has installed solar panels on its buildings. AXA MPS has been certified as a company that supports energy production from renewable sources, with the possibility to use the brand "Energia Pura" provided by Enel, Italy's main energy provider.

CO2 emissions: transportation and energy

AXA's CO2 emissions per FTE related to energy and business travel (air, rail and car fleet) were reduced by 29% between 2007 and 2009. 61% of Group CO2 emissions come from energy, 22% from Business Travel (air and train) and 17% from AXA vehicle fleet. Employee commuting-related CO2 emissions per FTE remained stable compared to 2007 at about 1 T eq. CO2.

Several initiatives aim to further reduce these emissions. AXA Winterthur set a 5% CO2 emissions (from business trips) reduction target for 2008-2009. A brochure on environmentally friendly business travel was published, with tips on using transport and telecommunication services. The entity has ten video conference rooms and an "AXA Presence" room (equipped with high-end telepresence systems), it uses AXA bikes / electric bikes and received an award for promoting the use of bicycles in its operations. AXA started rolling out its Telepresence facilities in 2008. In 2009, the Group had 35 Telepresence rooms in 12 countries, which are estimated to have saved 3,100 T eq. CO2, 2,574 trips for a total of 28million km. In 2010, AXA plans to double the number of Telepresence rooms. AXA PPP Healthcare in the UK has introduced electric delivery vans to distribute internal mail. AXA France set a maximum threshold of 200gr CO2/km for all the order of its vehicles and offers the possibility to order a Toyota Prius (hybrid vehicle). The emission threshold for commercial vehicles at AXA France was set at 140 g de CO2/km. In Luxembourg a maximum threshold has also been set. AXA Canada adopted a similar approach to its executives' vehicle fleet and monitors related fuel savings. AXA Luxembourg has also put in place maximum thresholds for its vehicle fleet CO2 emissions. Both AXA France and AXA Germany launched car-sharing websites open to all employees, which helps to reduce the carbon footprint of employee commuting. In France, 570 employees used the site at year end 2009, and an average 600 car-sharing offers are active. AXA France also implemented eco-driving courses for sales teams in certain regions, which led to an average 12% in fuel savings. AXA UK launched extensive internal awareness campaigns with its "Cut a kilo for World Environment Day" event and "kick the CO2 habit" scheme. The AXA Group headquarters, in agreement with local employee representatives, inserted criteria related to local carbon emissions reductions in the calculation of its profit-sharing agreement. The carbon footprint criteria represents 10% of this profit sharing agreement.

Water consumption

AXA's water consumption per FTE decreased by 3% between 2007 and 2009. Related initiatives include AXA Winterthur, which has fitted water-saving faucets throughout the building of the head office. AXA Corporate Solutions improved its cooling towers to reduce water consumption.

Paper consumption

Although AXA's paper consumption decreased by 3% between 2007 and 2008, it is not possible to track performance in 2009, as the reporting standards have changed for this indicator. AXA now tracks both office paper and marketing and distribution paper separately, in order to more accurately measure our impact. AXA is working on increasing the volume of paper from recycled sources or sustainably managed forests, but has decrease its overall consumption due to the integration of additional volumes of marketing and distribution paper. In 2009, 31.4% of AXA's total paper consumption is from these sources (58% of office paper is from recycled sources compared to 20% of marketing and distribution paper).



Related initiatives include efforts by AXA Spain to use a much shorter version of its car insurance policy to be signed and returned by customers (from 16 sheets of paper down to 1 sheet; the savings are estimated at 580 tons of paper per year). AXA PPP (UK) reduced the overall amount of paper used by over 22%, while the use of recycled and mixed Forest Stewardship Council (FSC) accredited paper was ramped up to over 50%. AXA France's profit-sharing agreement, concluded with local employee representatives, now includes paper consumption and paper recycling targets (representing 5% of the agreement's related bonus).

Waste management

AXA does not seek to monitor waste volumes but its IT business unit AXA Technology Services, for which electronic waste is of particular relevance, ensures compliance with the Waste Electronic and Electrical Equipment (WEEE) Directive. Ink cartridges are systematically recycled by local entities, and numerous affiliates voluntarily collect various waste streams for recycling (eg. used batteries). Other initiatives include AXA Spain which seeks to raise awareness on waste segregation among employees through special information materials and volunteer employees explaining to their peers the rules of recycling, or AXA France which collects compact fluorescent lamps and used mobile phones, the latter being recycled by work-integration organisations.

> Business-related environmental impacts: "green" insurance and "responsible investment"

In addition to reducing its operational environmental footprint, the Group seeks to minimize its "indirect" impact on the environment by offering insurance and investment solutions to promote environmentally-friendly behavior. Some of the initiatives put in place pursuant to this aim in the areas of Property & Casualty insurance and asset management. For example, AXA subsidiaries offer limited mileage motor insurance policies to encourage customers to reduce their vehicle use and, therefore, their CO2 emissions, or reduced premiums for low emissions vehicles. Certain affiliates offer special home insurance policies for environmentally-conscious homeowners, favor environmentally-friendly products when replacing insured appliances, actively advise "green" entrepreneurs and SMEs about environmental risks, or promote the development of renewable energies via adapted policies covering the equipment and the revenues derived from electric energy sales, etc. AXA IM has developed a range of investment products and shareholder engagement services integrating environmental considerations, and applies environmental criteria to its real estate investment portfolio. These examples are described in the Activity Report and on AXA's website (www.axa.com).

> 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.
- 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. AXA's Risk Foundation's budget is now included in the AXA Research Fund's budget.



redefining / standards

- 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 quantitative data, targets, awards, etc, please refer to above texts.
- Environmental reporting, 2009 Group data: see below. Note – 2010 data will be published March 2011.



AXA GROUP ENVIRONMENTAL INDICATORS ⁽¹⁾	UNIT	2007	2008	2009
Number of employees on site, Full-Time Equivalent (FTEs)	FTE	103 317	121 990	121 108
Net internal area (sites)	m2	2 400 504	2 487 602	2 330 602
POWER (sites)				
Power consumption ⁽²⁾	Kwh	565 899 760	627 987 507	617 473 679
KPI: Power consumption per person	Kwh/FTE	5 477	5 148	5 099
Evolution compared to 2007			-6%	-7%
TRANSPORTATION				
Business travel: airplane and train ⁽³⁾	Km	588 852 537	352 931 708	257 875 862
Business travel: AXA vehicle fleet	Km	288 261 087	393 466 688	333 923 046
Home/workplace commute (round trip) ⁽⁴⁾	Km	990 579 720	1 258 507 154	1 219 253 316
CO2 EMISSIONS ⁽⁵⁾				
CO2 emissions resulting from onsite power consumption	T eq. CO2	173 619	225 833	216 542
CO2 emissions resulting from business travel: airplane and train	T eq. CO2	197 118	116 907	78 691
CO2 emissions resulting from business travel: AXA vehicle fleet	T eq. CO2	57 598	77 513	60 461
KPI: CO2 emissions resulting from onsite power consumption and business travel (airplane, train, AXA vehicle fleet) per person	T eq. CO2 / FTE	4,15	3,44	2.94
Evolution compared to 2007			-17%	-29%
CO2 emissions resulting from home/workplace commute ⁽⁶⁾	T eq. CO2	104 208	133 773	123 830
WATER				
Water consumption ⁽⁷⁾	m3	1 070 156	1 263 816	1 215 053
KPI: Water consumption per person	m3/FTE	10,36	10,36	10,03
Evolution compared to 2007			0%	-3%
PAPER⁽⁸⁾				
Paper consumption	T	13 583	15 337	N/A
Paper consumption per person	kg/FTE	130	126	N/A
Office paper consumption	T			5 995
KPI: Office paper consumption per person	kg/FTE			49
Marketing and distribution paper consumption	T			14 022
KPI: Marketing and distribution paper consumption per customer⁽⁹⁾	kg/customer			0.149
Percentage of paper recycled and/or guaranteeing sustainable management	%	38	49	31

(1) In 2009, environmental indicators were collected for sites representing 99 296 FTEs and were then extrapolated, continent by continent, to cover all 121 108 salaried FTEs working at the AXA Group as of 31/12/2009. In 2008, this process took place on the basis of data collected from 98 918 FTEs, extrapolated to 121 990 FTEs.

(2) This includes electricity, natural gas, fuel, steam and other sources of energy.

(3) This data has been collected from 94 563 FTEs. Entities reduced their business travel significantly due to budget constraints in 2009, which explains this decrease compared to 2008. AXA Assistance France excluded repatriation data in its 2009 reporting, which also helps explain this decrease.

(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 21 955 FTEs. Sites whose response rate was below 5% have been excluded from the data consolidation process.

(5) CO2 emissions estimation: as in 2007 and 2008, emissions factors specific to each country have been used for electricity, train, air and road travel. These factors are based on standards established by ADEME (Agence de l'Environnement et de la Maîtrise de l'Energie – France) and the Greenhouse Gas Protocol.

(6) This data does not include company cars, to avoid double counting with the AXA vehicle fleet data.

(7) This data has been collected from 89 173 FTEs. Many sites in Asia and America are not equipped with water meters, which prevents their accurate measurement.



redefining / standards

(8) A new data collection method was put in place in 2009, which included significant and previously unidentified sources of paper consumption related to business operations (marketing materials, sales brochures and customer invoicing, etc). These new paper streams are now better identified and included in the reporting process. We have now separated paper consumption into “office paper” and “marketing and distribution paper” to track these consumption flows more accurately.

(9) The Group has 94 356 994 customers, as per data collected by Group Marketing.



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. Anyone reporting in good faith any practices or actions that they believe to be inappropriate or inconsistent with any of the policies set forth in the Guide will not face disciplinary sanctions and will be protected against retaliation from others even if the reported facts are later proven inaccurate or are not acted upon. In addition, 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 2009-2010, AXA developed a Compliance training module for all employees, to be gradually implemented.

Results or outcomes

Vigeo, an SRI agency, analysed the anti-corruption practices of 772 European companies and ranked AXA fourth best player in this area, with a score of 78/100 vs an average of 56/100.

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/>