



AXA GLOBAL BUSINESS SERVICES PVT LTD		
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Title – AXA GBS Whistleblowing & Investigation Policy	Date	15/04/2024
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Change History

Version	Date Issued	Details of Change	Approved by (Owner): AXA GBS Internal Audit	Author
1.15	April, 15, 2024	Revised to align with Revised Group recommended policy released during Dec 2023.	Santosh Hegde, Chief Audit Executive	Arun Chandran, AM Legal & Compliance and Reviewed by Tanuja Jaydeep Sardesai (Lead-Legal & Compliance)

1. Introduction

The purpose of this policy is to outline what whistleblowing at **AXA Global Business Services (AXA GBS, AGBS)** means and how it is managed. It sits under Standard 24 Whistleblowing & Investigations.

At AXA we are encouraged to report, in good faith, any concerns of behaviour or processes believed to be inappropriate, unethical or illegal which may cause detriment to (an) individual(s) or AXA. This is known as whistleblowing.

This policy sets out the minimum requirements applicable to all **AGBS** employees and other stakeholders including past employees, current and past vendors as well as other AXA entities to which AGBS provides service. It must be reviewed in line with the Group Whistleblowing & Investigations Guidelines and at least annually. It is available to all employees.

2. Whistleblowing definition

At **AGBS**, whistleblowing is the reporting of a concern (*allegation*) on any of the following:

1. Bribery, Corruption & Conflict of Interest
2. Money laundering, financing terrorism or breaching sanctions
3. Internal fraud
4. Financial Misstatements



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5. Sexual harassment¹
6. Other harassment
7. Discrimination
8. Inappropriate behaviour
9. Theft of money, belongings or assets
10. Leakage of data or intellectual property
11. Breach of other laws & regulations²

This differs from other types of *complaints*, which can cover a wide range of subjects. For example, the following types of complaints would not be considered as whistleblowing:

- A customer reporting that their car is not being repaired following an accident because AXA refuses to pay their claim (unhappy customer).
- An employee who is unhappy with their bonus
- An employee who is frustrated with the outcome of a meeting, etc.

These types of complaints must be handled through other existing channels (i.e., customer complaints, HR grievance, discussion with line management, etc.).

Whereas whistleblowing could be, for example:

- A customer alleges that their car is not being repaired following an accident because the AXA claim handler/agent is pressuring them to use a specific garage they personally recommend rather than a garage accredited by AXA, and they feel like the specific claims handler has a vested interest. (This is an allegation of potential corruption.)
- An employee alleges that they have been intentionally denied a job promotion due to a personal characteristic, such as ethnicity or gender. (This is an allegation of discrimination.)

3. How to raise an allegation

Allegations can be raised through various channels, for example line management, a trusted colleague, the dedicated local whistleblowing hotline **whistleblower@axa.com**, local Audit at (**santosh.hegde@axa.com**), or to Group Audit directly (**speak-up@axa.com**).

4. Investigations

An independent Investigations team (reporting to Chief Audit Executive of AGBS) monitors whistleblowing and investigates concerns where appropriate.

All allegations received will be triaged and those which fall within this Whistleblowing &

¹ Sexual harassment cases will be investigated in line with the regulatory requirements (Prevention of Sexual Harassment (POSH) guidelines.)

² Including AXA Compliance and Ethics Code and local anti-corruption code of conduct.



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Investigations Policy (criteria in section 2) will be logged in AXA’s global internal audit tool, CAPT.

All allegations received will be acknowledged to the whistleblower promptly (target response time should be within 7 working days from receipt), and an update provided within 3 months. Both targets should be met except where there are justifiable extenuating circumstances. If at any point it becomes clear that the allegation is not admissible under the Whistleblowing & Investigations Policy, the reasons will be provided in writing to the whistleblower.

Whistleblowing and investigations are confidential. Leaking of confidential information will be subject to appropriate disciplinary action.

5. Protection under this policy

You can whistle-blow without fear of retaliation to raise a concern in good faith of behaviour or processes believed to be inappropriate, unethical, or illegal which may cause detriment to (an) individual(s) or **AGBS**.

In whistleblowing, you can be confident that you will be treated fairly. Any disclosure you make will be taken seriously and your identity will be known only to those involved in the independent investigation unless there is a specific legal requirement.

Retaliation against someone who has raised concerns under this policy, or any allegation raised in bad faith will be subject to appropriate disciplinary action.

Wording in employment contracts and settlement agreements for employees leaving **AGBS** must not prohibit those employees from reporting a whistleblowing disclosure.

Any person (including colleagues) facilitating the reporting of a whistleblowing are also protected under this policy.

6. Legal aspects

If you wish to take legal advice before reporting a concern, AGBS Legal cannot advise you in a personal capacity.

Allegations and the final investigative report are retained for a minimum of 10 years.

7. Roles and Responsibilities

Whistleblowing, Investigations and the associated policy and processes are owned by Internal Audit of AGBS headed by Mr. Santosh Hegde, Chief Audit Executive.