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www.aviva.com

Communication on progress

UN Global Compact

Chief Executive Statement of Support

We believe that to deliver on our purpose to free people from fear of uncertainty we have to act responsibly, sustainably and with integrity. Our four values – care more, kill complexity, never rest and create legacy guide us in a rapidly changing world as an ethically, environmentally and socially responsible insurer.

Twelve years into our UNGC membership we remain passionate about upholding the ten principles of the Global Compact on human rights, labour, environment and anti-corruption.

With this communication we express our commitment to continue working to embed these principles in the way we do business and to act as an advocate on the issues in our sphere of influence.

Mark Wilson
Group Chief Executive



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Aviva's Communication on Progress to the UNGC-2013

Implementing the Ten Principles into Strategies & Operations

Criterion 1: The COP describes mainstreaming into corporate functions and business units

- ◆ Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc.) ensuring no function conflicts with company's sustainability commitments and objectives
[http://www.aviva.com/corporate-responsibility/our-approach/
http://www.aviva.com/media/upload/CR-2013_1.pdf](http://www.aviva.com/corporate-responsibility/our-approach/http://www.aviva.com/media/upload/CR-2013_1.pdf) (Page 17)
- ◆ Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy
[http://www.aviva.com/corporate-responsibility/our-approach/
http://www.aviva.com/media/upload/CR-2013_1.pdf](http://www.aviva.com/corporate-responsibility/our-approach/http://www.aviva.com/media/upload/CR-2013_1.pdf) (Page 17)
- ◆ Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary
[http://www.aviva.com/corporate-responsibility/our-approach/
http://www.aviva.com/media/upload/CR-2013_1.pdf](http://www.aviva.com/corporate-responsibility/our-approach/http://www.aviva.com/media/upload/CR-2013_1.pdf) (Page 17)
http://www.aviva.com/media/upload/Corporate_Responsibility_Environment_and_Climate_Change_Business_Standard.pdf
- ◆ Design corporate sustainability strategy to leverage synergies between and among issue areas and to deal adequately with trade-offs
http://www.aviva.com/media/upload/CR-2013_1.pdf (Page 16)
- ◆ Other established or emerging best practices
<http://www.aviva.com/corporate-responsibility/our-approach/stakeholder-engagement/>

Criterion 2: The COP describes value chain implementation

- ◆ Communicate policies and expectations to suppliers and other relevant business partners
<http://www.aviva.com/corporate-responsibility/our-approach/stakeholder-engagement/>
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/supply-chain/>



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- ◆ Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence
<http://www.aviva.com/corporate-responsibility/our-approach/>
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/business-standards>
- ◆ Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners
<http://www.aviva.com/corporate-responsibility/tackling-climate-change/>
<http://www.aviva.com/corporate-responsibility/responsible-investment/public-policy-and-advocacy/>
<http://www.aviva.com/corporate-responsibility/our-approach/stakeholder-engagement/>

Robust Human Rights Management Policies & Procedures

Criterion 3: The COP describes robust *commitments, strategies or policies* in the area of human rights

- ◆ Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates (e.g., the Universal Declaration of Human Rights, Guiding Principles on Human Rights)
http://www.aviva.com/media/upload/Corporate_Responsibility_Environment_and_Climate_Change_Business_Standard.pdf
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/human-rights/>
http://www.aviva.com/media/upload/CR-2013_1.pdf (Page 9)
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/business-ethics/>
- ◆ Integrated or stand-alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/human-rights/>
- ◆ Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/human-rights/>
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/human-rights/our-approach-cluster-munitions/>
http://www.aviva.com/media/upload/Corporate_Responsibility_Environment_and_Climate_Change_Business_Standard.pdf
http://www.aviva.com/media/upload/People_business_standard.pdf



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- ◆ Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/human-rights/>
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/human-rights/our-approach-cluster-munitions/>
[http://www.aviva.com/media/upload/Corporate Responsibility Environment and Climate Change Business Standard.pdf](http://www.aviva.com/media/upload/Corporate_Responsibility_Environment_and_Climate_Change_Business_Standard.pdf)

Criterion 4: The COP describes effective *management systems* to integrate the human rights principles

- ◆ Process to ensure that internationally recognized human rights are respected
<http://www.aviva.com/media/upload/SR-2013.pdf> (Page 50)
[http://www.aviva.com/media/upload/Corporate Responsibility Environment and Climate Change Business Standard.pdf](http://www.aviva.com/media/upload/Corporate_Responsibility_Environment_and_Climate_Change_Business_Standard.pdf)
<http://www.aviva.com/corporate-responsibility/diversity-and-inclusion/>
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/supply-chain/>
- ◆ On-going due diligence process that includes an assessment of actual and potential human rights impacts
<http://www.aviva.com/corporate-responsibility/responsible-investment/>
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/human-rights/>
<http://www.aviva.com/media/upload/SR-2013.pdf> (Pages 50-51)
- ◆ Operational-level grievance mechanisms for those potentially impacted by the company's activities
[http://www.aviva.com/media/upload/Business Ethics Code Q12014v1.pdf](http://www.aviva.com/media/upload/Business_Ethics_Code_Q12014v1.pdf) (Page 6, Right Call)

As well as Right Call, our independent malpractice reporting service, we provide employees with free access to Your Call. This is a totally confidential personal support service, available 24 hours a day, every day of the year. It helps employees tackle a range of issues from work-related matters, to personal life issues.

Customers or the general public can contact Aviva with queries about our CR Programme (which includes our approach to Human Rights) at cr.team@aviva.com which appears, among other places, at this webpage:
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/human-rights/>

- ◆ Allocation of responsibilities and accountability for addressing human rights impacts
<http://www.aviva.com/investor-relations/corporate-governance/board-of-directors/board-committees/governance-committee/>
http://www.aviva.com/media/upload/CR-2013_1.pdf (Page 17)



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Criterion 5: The COP describes effective *monitoring and evaluation mechanisms* of human rights integration

- ◆ System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/supply-chain/>

Robust Labour Management Policies & Procedures

Criterion 6: The COP describes robust *commitments, strategies or policies* in the area of labour

- ◆ Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/human-rights/>
http://www.aviva.com/media/upload/business_code_of_behaviour.pdf
- ◆ Written company policy to obey national labour law, respect principles of the relevant international labour standards in company operations worldwide, and engage in dialogue with representative organization of the workers (international, sectoral, national).
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/business-standards/> (All business standards require compliance with local laws and regulations)
http://www.aviva.com/media/upload/Business_Ethics_Code_Q12014v1.pdf (Principle one: Comply with local laws and regulations of the local market)
- ◆ Inclusion of reference to the principles contained in the relevant international labour standards in contracts with suppliers and other relevant business partners
http://www.aviva.com/media/upload/Procurement_and_Outsourcing_business_standard_Exec_Summary.pdf
http://www.aviva.com/media/upload/business_code_of_behaviour.pdf
- ◆ Participation and leadership in wider efforts by employers' organizations (international and national levels) to jointly address challenges related to labour standards in the countries of operation, possibly in a tripartite approach (business – trade union – government).
http://www.aviva.com/media/upload/CR-2013_1.pdf (Page 47, Living wage)
<http://www.livingwage.org.uk/blog/aviva-extends-living-wage-commitment>

① Other established or emerging best practices

Our markets engage with a Union or Representative Body independently.

As an example:

UK

Your Forum is the mechanism through which the Company discharges its obligations to collectively consult appropriate representatives in connection with any



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proposed redundancies (as required by the Trade Union and Labour Relations (Consolidation) Act 1992) or a business transfer (as required by the Transfer of Undertakings (Protection of Employment) Regulations 2006 or any other matter on which there is a statutory requirement to consult with appropriate representatives.

Aviva UK also has a procedures and facilities agreement with Unite the Union. As part of the agreement with Unite, Trade Union nominated representatives also form part of the wider Your Forum membership.

Europe

Aviva has established a formal channel to facilitate consultation and the transfer of information between management and staff across national boundaries within European Union Member States, on transnational issues interest – the European Consultative Forum. Agreement complies fully with all the requirements of Article 13 of the Directive 94/45/EC. Aviva plc. in the UK is designated as central management for the purposes of the European Works Council Directive 2009/38/EC.

Criterion 7: The COP describes effective *management systems* to integrate the labour principles

- ◆ Allocation of responsibilities and accountability within the organization
<http://www.aviva.com/media/upload/CR-2013.pdf> (Page 17)
- ◆ Internal awareness-raising and training on the labour principles for management and employees
<http://www.aviva.com/corporate-responsibility/diversity-and-inclusion/>
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/human-rights/>
- ◆ Active engagement with suppliers to address labour-related challenges
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/human-rights/>
http://www.aviva.com/media/upload/business_code_of_behaviour.pdf
- ◆ Grievance mechanisms, communication channels and other procedures (e.g., whistleblower mechanisms) available for workers to report concerns, make suggestions or seek advice, designed and operated in agreement with the representative organization of workers
http://www.aviva.com/media/upload/Business_Ethics_Code_Q12014v1.pdf (Page 6, Right Call)



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<http://www.aviva.com/corporate-responsibility/trust-and-transparency/human-rights/>

Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration

- ◆ System to track and measure performance based on standardized performance metrics
<http://careers.aviva.co.uk/about-aviva?section=what-we-do>
http://www.aviva.com/media/upload/CR-2013_1.pdf (Page 16)
- ◆ Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future
http://www.aviva.com/media/upload/CR-2013_1.pdf (Page 16, Employee promise survey)
<http://www.aviva.com/corporate-responsibility/diversity-and-inclusion/>
<http://www.aviva.com/2013ar> (Page 47)
- ◆ Audits or other steps to monitor and improve the working conditions of companies in the supply chain, in line with principles of international labour standards
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/supply-chain/>
- ◆ Process to positively engage with the suppliers to address the challenges (i.e., partnership approach instead of corrective approach) through schemes to improve workplace practices
<http://www.aviva.com/2013ar> (Page 51)
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/supply-chain/>

Robust Environmental Management Policies & Procedures

Criterion 9: The COP describes robust *commitments, strategies or policies* in the area of environmental stewardship

- ◆ Reference to relevant international conventions and other international instruments (e.g. Rio Declaration on Environment and Development)
<http://www.aviva.com/corporate-responsibility/tackling-climate-change/climatewise-reports/report-2013/>



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- ◆ Reflection on the relevance of environmental stewardship for the company
<http://www.aviva.com/corporate-responsibility/tackling-climate-change/>
<http://www.aviva.com/media/upload/ARA-2013.pdf> (Page 45)
- ◆ Written company policy on environmental stewardship
http://www.aviva.com/media/upload/Corporate_Responsibility_Environment_and_Climate_Change_Business_Standard.pdf
http://www.avivainvestors.com/cs/groups/internet/documents/salessupportmaterial/zg_zf/mdi0/~edisp/pdf_024453.pdf
- ◆ Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners
http://www.aviva.com/media/upload/business_code_of_behaviour.pdf
- ◆ Specific commitments and goals for specified years
<http://www.aviva.com/corporate-responsibility/how-are-we-performing/environment/>
<http://www.aviva.com/media/upload/ARA-2013.pdf> (Page 280)
- ◆ Other established or emerging best practices

Whilst we have been purchasing carbon credits from the voluntary carbon market since 2006 and we knew the projects contributed to sustainable development, we wanted to be able to accurately measure the community value of the projects through the lives improved using a methodology that we use of our community development work. We were able to calculate that through some of the projects chosen from 2011 to 2013 we have impacted over 395 lives.

<http://www.forumforthefuture.org/greenfutures/articles/aviva%E2%80%99s-carbon-offsetting-projects-improve-200000-lives>

Criterion 10: The COP describes effective *management systems* to integrate the environmental principles

- ◆ Environmental risk and impact assessments
<http://www.aviva.com/corporate-responsibility/tackling-climate-change/climatewise-reports/report-2013/>
<http://www.aviva.com/media/upload/ARA-2013.pdf> (Page 45)
<http://www.aviva.com/media/upload/ARA-2013.pdf> (Page 227)
- ◆ Assessments of lifecycle impact of products, ensuring environmentally sound management policies
<http://www.aviva.com/corporate-responsibility/tackling-climate-change/managing-our-carbon-footprint/>
<http://www.aviva.com/corporate-responsibility/tackling-climate-change/climatewise-reports/report-2013/>
<http://www.aviva.com/corporate-responsibility/tackling-climate-change/sustainable-claims-processes/>



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- ◆ Allocation of responsibilities and accountability within the organization
http://www.aviva.com/media/upload/CR-2013_1.pdf (Page 17)

Criterion 11: The COP describes effective *monitoring and evaluation mechanisms* for environmental stewardship

- ◆ System to track and measure performance based on standardized performance metrics
<http://www.aviva.com/corporate-responsibility/how-are-we-performing/environment/>
<http://www.aviva.com/media/upload/CR-2013.pdf>
- ◆ Leadership review of monitoring and improvement results
<http://www.aviva.com/media/upload/CR-2013.pdf>
<http://www.aviva.com/media/upload/CR-2013.pdf> (Page 17)
- ◆ Outcomes of integration of the environmental principles
<http://www.aviva.com/media/upload/CR-2013.pdf> (Pages 3-4)

Robust Anti-Corruption Management Policies & Procedures

Criterion 12: The COP describes robust *commitments, strategies or policies* in the area of anti-corruption

- ◆ Support by the organization's leadership for anti-corruption
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/business-ethics/>
<http://www.aviva.com/media/upload/CR-2013.pdf> (Pages 8-9)
- ◆ Publicly stated formal policy of zero-tolerance of corruption
http://www.aviva.com/media/upload/Business_Ethics_Code_Q12014v1.pdf
- ◆ Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes
http://www.aviva.com/media/upload/Business_Ethics_Code_Q12014v1.pdf
<http://www.aviva.com/investor-relations/corporate-governance/code-ethics/>
- ◆ Statement of support for international and regional legal frameworks, such as the UN Convention against Corruption
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/human-rights/>
- ◆ Detailed policies for high-risk areas of corruption
Our Financial Crime Standard is available internally.
The Standard states Aviva's zero tolerance for any acts constituting financial crime including bribery and corruption, money laundering, fraud and violations of applicable



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sanctions laws. The Standard requires each market to designate specific persons responsible for financial crime prevention. It requires markets to undertake financial crime risk assessments, implement systems and controls to prevent, detect and report, consistent with applicable laws and regulations. The Standard also requires monitoring of transactions, financial crime training, reporting suspicious activity, and management information to be collated and provided to management. Political and charitable contributions are addressed in the Business Ethics Code.

- ◆ Policy on anti-corruption regarding business partners
http://www.aviva.com/media/upload/Business_Ethics_Code_Q12014v1.pdf

Criterion 13: The COP describes effective *management systems* to integrate the anti-corruption principle

- ◆ Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees
http://www.aviva.com/media/upload/Business_Ethics_Code_Q12014v1.pdf
<http://www.aviva.com/media/upload/CR-2013.pdf> (Page 3)
<http://www.aviva.com/media/upload/internal-control-business-standards.pdf>
http://www.aviva.com/media/upload/People_business_standard.pdf
- ◆ Internal checks and balances to ensure consistency with the anti-corruption commitment
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/financial-crime/>
- ◆ Actions taken to encourage business partners to implement anti-corruption commitments
http://www.aviva.com/media/upload/Business_Ethics_Code_Q12014v1.pdf
- ◆ Management responsibility and accountability for implementation of the anti-corruption commitment or policy
Our Financial Crime Standard is available internally.
The Standard states Aviva's zero tolerance for any acts constituting financial crime including bribery and corruption, money laundering, fraud and violations of applicable sanctions laws. The Standard requires each market to designate specific persons responsible for financial crime prevention. It requires markets to undertake financial crime risk assessments, implement systems and controls to prevent, detect and report, consistent with applicable laws and regulations. The Standard also requires monitoring of transactions, financial crime training, reporting suspicious activity, and management information to be collated and provided to management. Political and charitable contributions are addressed in the Business Ethics Code.



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- ◆ Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/business-ethics/>
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/financial-crime/>

Criterion 14: The COP describes effective *monitoring and evaluation mechanisms* for the integration of anti-corruption

- ◆ Leadership review of monitoring and improvement results
<http://www.aviva.com/investor-relations/corporate-governance/internal-controls/>
<http://www.aviva.com/media/upload/CR-2013.pdf> (Page 3)
- ◆ Process to deal with incidents
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/business-ethics/>
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/financial-crime/>

Taking Action in Support of Broader UN Goals and Issues

Criterion 15: The COP describes core business contributions to *UN goals and issues*

- ◆ Align core business strategy with one or more relevant UN goals/issues
<http://www.aviva.com/corporate-responsibility/our-approach/>
<http://www.aviva.com/media/upload/aviva-2013-results-presentation.pdf>
- ◆ Develop relevant products and services or design business models that contribute to UN goals/issues
<http://www.aviva.com/corporate-responsibility/tackling-climate-change/sustainable-claims-processes/>
<http://www.aviva.com/corporate-responsibility/tackling-climate-change/climatewise-reports/report-2013/> (Principle 4)

Criterion 16: The COP describes strategic social investments and philanthropy

- ◆ Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy
<http://www.aviva.com/corporate-responsibility/responsible-investment/>
<http://www.aviva.com/corporate-responsibility/responsible-investment/case-study-milestone-un-sustainable-stock-exchanges/>
<http://www.aviva.com/corporate-responsibility/community-development/>
<http://www.aviva.com/corporate-responsibility/our-approach/>



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- ◆ Coordinate efforts with other organizations and initiatives to amplify—and not negate or unnecessarily duplicate—the efforts of other contributors
<http://www.aviva.com/corporate-responsibility/our-approach/stakeholder-engagement/>
<http://www.thecroforum.org/>
- ◆ Take responsibility for the intentional and unintentional effects of funding and have due regard for local customs, traditions, religions, and priorities of pertinent individuals and groups
http://www.aviva.com/media/upload/CR-2013_1.pdf

Criterion 17: The COP describes advocacy and public engagement

- ◆ Publicly advocate the importance of action in relation to one or more UN goals/issues
<http://www.aviva.com/corporate-responsibility/our-approach/reporting/ungc/>
- ◆ Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues
<http://www.aviva.com/corporate-responsibility/our-approach/stakeholder-engagement/>
<http://www.aviva.com/corporate-responsibility/responsible-investment/case-study-milestone-un-sustainable-stock-exchanges/>
<http://www.aviva.com/corporate-responsibility/responsible-investment/public-policy-and-advocacy/>

Criterion 18: The COP describes partnerships and collective action

- ◆ Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy
<http://www.aviva.com/corporate-responsibility/responsible-investment/public-policy-and-advocacy/>
<http://www.aviva.com/corporate-responsibility/responsible-investment/case-study-milestone-un-sustainable-stock-exchanges/>
<http://www.aviva.com/corporate-responsibility/our-approach/stakeholder-engagement/>
- ◆ Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain
<http://www.aviva.com/corporate-responsibility/our-approach/stakeholder-engagement/>



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Corporate Sustainability Governance and Leadership

Criterion 19: The COP describes CEO commitment and leadership

- ◆ CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact
http://www.aviva.com/media/upload/CR-2013_1.pdf (Page 2)
- ◆ CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation
http://www.aviva.com/media/upload/CR-2013_1.pdf
<http://www.aviva.com/media/upload/ARA-2013.pdf> (Pages 18-29)

Criterion 20: The COP describes Board adoption and oversight

- ◆ Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.
<http://www.aviva.com/investor-relations/corporate-governance/board-of-directors/board-committees/governance-committee/>
- ◆ Board (or committee), where permissible, approves formal reporting on corporate sustainability (Communication on Progress)
<http://www.aviva.com/investor-relations/corporate-governance/board-of-directors/board-committees/governance-committee/>

Criterion 21: The COP describes stakeholder engagement

- ◆ Publicly recognize responsibility for the company's impacts on internal and external stakeholders
<http://www.aviva.com/corporate-responsibility/our-approach/stakeholder-engagement/>
- ◆ Define sustainability strategies, goals and policies in consultation with key stakeholders
<http://www.aviva.com/corporate-responsibility/our-approach/stakeholder-engagement/>
http://www.aviva.com/media/upload/CR-2013_1.pdf (Page 16)
- ◆ Consult stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in reviewing performance
<http://www.aviva.com/corporate-responsibility/our-approach/stakeholder-engagement/>
- ◆ Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect 'whistle-blowers'
<http://www.aviva.com/corporate-responsibility/our-approach/stakeholder-engagement/>
http://www.aviva.com/media/upload/CR-2013_1.pdf