

Aviva's Communication on Progress to the UNGC-2015

Company profile and context of operations

http://www.aviva.com/media/upload/Aviva-SR-2015_LtFjPWz.pdf

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/responsible-sustainable-business/our-sustainable-business-strategy/>
- ◆ 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/corporate-responsibility/our-approach/governance/>
http://www.aviva.com/media/upload/Corporate_Responsibility_Environment_and_Climate_Change_Business_Standard-2015.pdf
<http://www.aviva.com/responsible-sustainable-business/policies/>
- ◆ 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/>
<http://www.aviva.com/responsible-sustainable-business/policies/>
- ◆ Undertake awareness-raising, training and other types of capacity building with suppliers, investors and other business partners
<http://www.aviva.com/corporate-responsibility/tackling-climate-change/>
<http://www.aviva.com/responsible-sustainable-business/responsible-investment/>
<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/Aviva-ARA-2015.pdf> (Page 54)
<http://www.aviva.com/responsible-sustainable-business/policies/>
- ◆ 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/media/upload/Our_Human_Rights_Policy.pdf
- ◆ 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/media/upload/Our_Human_Rights_Policy.pdf
<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-2015.pdf
http://www.aviva.com/media/upload/People_business_standard_2015.pdf
- ◆ Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties
http://www.aviva.com/media/upload/Our_Human_Rights_Policy.pdf
<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-2015.pdf
http://www.aviva.com/media/upload/People_business_standard_2015.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/library/2014ar/pdf/aviva-strategic-report-2014.pdf> (page 51)
http://www.aviva.com/media/upload/Corporate_Responsibility_Environment_and_Climate_Change_Business_Standard-2015.pdf
<http://www.aviva.com/corporate-responsibility/diversity-and-inclusion/>
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/supply-chain/>
- ◆ Operational-level grievance mechanisms for those potentially impacted by the company's activities
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/business-ethics/> (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/responsible-sustainable-business/policies/>

- ◆ Allocation of responsibilities and accountability for addressing human rights impacts
[http://www.aviva.com/media/upload/Governance Committee Terms of Reference - Final Approved by Board 9 December 2015.pdf](http://www.aviva.com/media/upload/Governance_Committee_Terms_of_Reference_-_Final_Approved_by_Board_9_December_2015.pdf)

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/responsible-sustainable-business/policies/>
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/responsible-sustainable-business/policies/>
- ◆ Inclusion of reference to relevant international labour standards in contracts with suppliers and other relevant business partners
http://www.aviva.com/media/upload/business_code_of_behaviour.pdf
Our contracts include standard clauses that explicitly refer to compliance with relevant ILO standards.
- ◆ 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/responsible-sustainable-business/our-stories/living-wage/>
<http://www.livingwage.org.uk/blog/aviva-extends-living-wage-commitment>

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/Aviva-SR-2015_LtFjPWz.pdf (Pages 48-51)

- ◆ Internal awareness-raising and training on the labour principles for management and employees
<http://www.aviva.com/responsible-sustainable-business/our-people/>
<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/responsible-sustainable-business/policies/> (See Business Ethics Code)

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 human rights related matters at cr.team@aviva.com which appears, among other places, at this webpage:

<http://www.aviva.com/responsible-sustainable-business/policies/>

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/routes-to-aviva/experienced/procurement>
<http://www.aviva.com/media/upload/Aviva-ARA-2015.pdf> (Page 312-Supplier KPIs)
- ◆ 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/responsible-sustainable-business/good-governance/>
<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/>
- ◆ 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/Aviva-ARA-2015.pdf> (Pages 45, 52-54, and 65)
file:///C:/Users/Garciav/Downloads/ClimateWise_principles_report_2015.pdf
- ◆ Written company policy on environmental stewardship
<http://www.aviva.com/responsible-sustainable-business/climate-risks-and-environmental-impacts/>
<http://www.aviva.com/corporate-responsibility/trust-and-transparency/business-standards/>
http://www.avivainvestors.com/cs/groups/internet/documents/salesupportmaterial/zqzf/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/Aviva-ARA-2015.pdf> (Page 312)
- ◆ Other established or emerging best practices
We worked closely with ClimateCare to develop a new way to measure and report the impact of offsetting our carbon emissions based on the methodology we use to measure our community investment impact. Our support not only reduces carbon emissions but also has an impact on people's health, resilience and livelihoods. In the past four year we have supported more than 400,000 people through our support these projects.

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

- ◆ Environmental risk and impact assessments
<http://www.aviva.com/library/2014ar/pdf/aviva-full-annual-report-2014.pdf> (Page 59)
- ◆ Assessments of lifecycle impact of products, ensuring environmentally sound management policies
<http://www.aviva.com/responsible-sustainable-business/climate-risks-and-environmental-impacts/operations/>
- ◆ Allocation of responsibilities and accountability within the organization
<http://www.aviva.com/corporate-responsibility/our-approach/governance/>

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/media/upload/Aviva-ARA-2015.pdf> (Page 312)

http://www.aviva.com/media/upload/CR_summary_2015.pdf

Robust Anti-Corruption Management Policies & Procedures

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

- ◆ Publicly stated formal policy of zero-tolerance of corruption
<http://www.aviva.com/media/upload/Business-Ethics-Code-August2015.pdf> (Page 8)

- ◆ 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-August2015.pdf>

All Aviva businesses are required to understand the scope of local legal and regulatory requirements, allocate clear responsibilities for compliance and monitor this compliance on an ongoing basis.

- ◆ 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 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, Legal guidelines on political donations and expenditures, and the CR and Environment Business Standard.
- ◆ Policy on anti-corruption regarding business partners
<http://www.aviva.com/responsible-sustainable-business/policies/> (See Internal Controls Standard and Business Ethics Code)

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

- ◆ Support by the organization's leadership for anti-corruption
<http://www.aviva.com/responsible-sustainable-business/policies/> (See Internal Controls Standard and Business Ethics Code)

- ◆ Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees

<http://www.aviva.com/responsible-sustainable-business/policies/> (See Business Ethics Code which all employees are required to sign up to annually)

We also have an internal essential learning computer based training (CBT) which contains a specific modules on anti-bribery and corruption and financial crime. All employees are required to complete this CBT once a year. See screenshot below. Additionally, employees working in this area get access to more advanced training.

The screenshot shows the Aviva Essential Learning interface. At the top, there's a yellow header with the Aviva logo and 'Essential Learning Welcome' text. Below the header, the main content area is titled 'Essential Learning'. It contains three paragraphs of introductory text and a large blue 'Start' button with a white arrow. To the right of the text is a vertical list of nine topics, each with a small icon and a checkbox. The topics are: Wellbeing, Diversity, Health and Safety, Anti-Bribery and Anti-Corruption, Financial Crime, Data Protection Act, Security and Business Continuity, Customer Conduct Risk, and Business Ethics Code. Below the list is a 'Key' section with four items: a grey box for 'Not attempted', a green checkmark for 'Passed', a red X for 'Failed', and a play button for 'Click to review topic'. At the bottom left of the page is a 'Menu' button.

- ◆ Internal checks and balances to ensure consistency with the anti-corruption commitment

<http://www.aviva.com/responsible-sustainable-business/our-stories/fighting-financial-crime/>

- ◆ 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, management information to be collated and provided to management. Political and charitable contributions are addressed in the Business Ethics Code, and the CR and Environment Business Standard.

- ◆ Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice
<http://www.aviva.com/responsible-sustainable-business/policies/> (See Business Ethics Code)

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/governance-structure/>
- ◆ Process to deal with incidents
<http://www.aviva.com/responsible-sustainable-business/policies/> (See Business Ethics Code)

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/responsible-sustainable-business/>
<http://www.aviva.com/responsible-sustainable-business/our-stories/supporting-the-un-global-goals-for-sustainable-development/>
- ◆ Develop relevant products and services or design business models that contribute to UN goals/issues
<http://www.aviva.com/responsible-sustainable-business/climate-risks-and-environmental-impacts/products-and-services/>
<http://www.aviva.com/responsible-sustainable-business/responsible-investment/>

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/responsible-sustainable-business/strengthening-communities/>
<http://www.aviva.com/responsible-sustainable-business/>
- ◆ 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/>
<http://www.aviva.com/responsible-sustainable-business/our-stories/supporting-the-un-global-goals-for-sustainable-development/>

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/responsible-sustainable-business/our-stories/supporting-the-un-global-goals-for-sustainable-development/>
http://www.aviva.com/media/upload/CR_summary_2015.pdf
<http://www.aviva.com/media/thought-leadership/climate-change-value-risk-investment-and-avivas-strategic-response/>

- ◆ 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/responsible-sustainable-business/our-stories/supporting-the-un-global-goals-for-sustainable-development/>
<http://www.aviva.com/media/thought-leadership/mobilising-finance-support-global-goals-sustainable-development/>
<http://www.aviva.com/media/thought-leadership/climate-change-value-risk-investment-and-avivas-strategic-response/>

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/responsible-sustainable-business/our-stories/human-rights-and-business/>
<http://www.aviva.com/responsible-sustainable-business/our-stories/investing-in-a-low-carbon-future/>
<http://www.aviva.com/media/thought-leadership/climate-change-value-risk-investment-and-avivas-strategic-response/>
- ◆ 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/responsible-sustainable-business/our-commitments/>
<http://www.aviva.com/responsible-sustainable-business/our-stories/investing-in-a-low-carbon-future/>

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 SDGs
<http://www.aviva.com/media/upload/Aviva-ARA-2015.pdf> (See page 55)
- ◆ CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards
<http://www.aviva.com/media/thought-leadership/mobilising-finance-support-global-goals-sustainable-development/>
http://www.aviva.com/media/upload/Mark_Wilson_Paris_Giant_leap_for_Humanity_s_peech.pdf

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/>
<http://www.aviva.com/corporate-responsibility/our-approach/governance/>

- ◆ Board (or committee), where permissible, approves formal reporting on corporate sustainability
<http://www.aviva.com/investor-relations/corporate-governance/board-of-directors/board-committees/governance-committee/>
- ◆ The Board oversees development of corporate sustainability strategy, defining goals and overseeing implementation
<http://www.aviva.com/media/upload/Aviva-ARA-2015.pdf> (See page 95)
<http://www.aviva.com/investor-relations/corporate-governance/board-of-directors/board-committees/governance-committee/>

Criterion 21: The COP describes stakeholder engagement

- ◆ Define sustainability strategies, goals and policies in consultation with key stakeholders
https://www.aviva.com/media/upload/Aviva_CR_stakeholder_engagement.pdf
- ◆ Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect 'whistle-blowers'
https://www.aviva.com/media/upload/Aviva_CR_stakeholder_engagement.pdf
<http://www.aviva.com/media/upload/Business-Ethics-Code-August2015.pdf>

Women's Empowerment

The COP describes policies and practices related to supporting women's empowerment and advancing gender equality in the workplace

- ◆ Achieving and maintaining gender equality in senior management and board positions
- ◆ Achieving and maintaining gender equality in middle management positions
- ◆ Equal pay for work of equal value
- ◆ Flexible work options
- ◆ Support for pregnant women and those returning from maternity leave
- ◆ Recruitment and retention, including training and development, of female employees
- ◆ Creating and maintaining workplace awareness of gender equality and, inclusion and non-discrimination for all workers
- ◆ Mentoring and sponsorship opportunities for women employees
<http://www.aviva.com/media/upload/Aviva-ARA-2015.pdf> (See pages 50, 51, and 86)
<http://unwomenuk.org/corporate/womens-empowerment-principles/>
<http://30percentclub.org/press-releases/view/aviva-commits-to-new-30-club-target>
<http://www.aviva.com/responsible-sustainable-business/our-people/>
http://www.aviva.com/media/upload/People_business_standard.pdf
<http://careers.aviva.co.uk/routes-to-aviva/apprentices>
<http://careers.aviva.co.uk/>
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/536648/Women_in_Finance_Charter_list_of_signatories.pdf

We have guidance, policies and procedures available to all employees through our corporate intranet, which though not exclusively about gender, directly support women's empowerment and advance gender equality in the workplace. Some examples of these include: Fairness and equality at the workplace policy, and guidelines on managing: gender in the workplace, pregnancy and maternity in the workplace, marriage and civil partnership in the workplace. We also have an

employee assistance service that provides support dealing with a wide range of issues and every year employees are required to complete an essential learning course that includes a diversity module.

The COP describes policies and practices related to supporting women's empowerment and advancing gender equality in the marketplace

- ◆ Asking suppliers to sign up to our business code of behaviour which contains requirements on access to equal opportunities
http://www.aviva.com/media/upload/business_code_of_behaviour.pdf
http://www.aviva.com/media/upload/ESG_Data_Sheet_2015_O7UrP9x.pdf

The COP describes policies and practices related to supporting women's empowerment and advancing gender equality in the community

- ◆ Designing community stakeholder engagements that are free of gender discrimination/stereotyping and sensitive to gender issues
- ◆ Ensuring female beneficiaries of community programmes
- ◆ Community initiatives specifically targeted at the empowerment of women and girls
- ◆ Strategies to ensure that community investment projects and programmes (including economic, social and environmental) positively impact women and girls
https://www.aviva.com/media/upload/Aviva_CR_stakeholder_engagement.pdf
<http://careers.aviva.co.uk/our-people>
<http://www.rosauk.org/our-partners/>
<http://www.vitainternational.media/en/article/2016/01/22/aviva-launches-community-fund-in-italy-to-support-non-profit-organisat/174/>
<http://streetchildren.org/toolkit-on-working-with-street-girls/> (Supported by Aviva)

The COP contains or refers to sex-disaggregated data

- ◆ Achieving and maintaining gender equality in senior management and board positions
- ◆ Achieving and maintaining gender equality in middle management positions
<http://www.aviva.com/media/upload/Aviva-ARA-2015.pdf> (See pages 50-51)