

Corporate responsibility

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United Nations Global Compact

Communication on Progress

"The global economic recession has created a change in thinking for the private sector. Businesses are re-evaluating what is important; moving from short-term gain to long term value. We have always believed that this should be the view of a responsible business and that focus on intangible issues is as important as the financial bottom line. Our communication of progress helps us publicly reaffirm these beliefs."

Andrew Moss

Group Chief Executive

Aviva is the world's fifth largest insurance group providing insurance, savings and investment products to 53 million customers across Europe, North America and Asia Pacific. We are the largest insurance services provider in the UK and one of the leading providers of life and pension products in Europe.

By acting responsibly for the long term in how we do business we will meet our ambition to provide prosperity and peace of mind to our customers.

This is our core purpose applied irrespective of whether economic conditions are favourable or challenging. Our global business strategy has stood Aviva in good stead to manage the risks and uncertainties experienced through the downturn in the world's economy while preparing for recovery and long-term growth. [Our people strategy](#) and [our CR strategy](#) play an important part in this, in maintaining our reputation as a preferred employer and responsible corporate citizen, in managing our resources and

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in reducing costs. Our board CR committee, established in 2006, is responsible for CR strategy and policy, and for reviewing our CR performance.

Aviva has supported the principles of the United Nations Global Compact (UN GC) since 2001. We are a member of the UK Network of the UN GC and chair the Network Liaison working group. We also participate in other country networks, in Lithuania, Turkey and Singapore.

In addition, through our role as an institutional investor we seek to influence performance of other GC signatories. Read more in our [CR Report 2009](#).

This Communication on Progress covers progress for 2009. Detailed information can be found in our [CR Report 2009](#), under the following sections: [people](#), [suppliers](#), [environment](#) and [living by our values](#).

Human rights

| Human rights | |
|--------------|---|
| Principle 1 | Businesses should support and respect the protection of internationally proclaimed human rights within their sphere of influence; and |
| Principle 2 | make sure they are not complicit in human rights abuses |

Actions

Aviva supports internationally proclaimed principles on human rights, including the UN Universal Declaration of Human Rights, the ILO core labour standards. Our group policies on [People](#), [CR](#) and [Purchasing and Supply Management](#) embody such principles.

Good human rights management focuses on our relationship with our employees, the design of our products and services and through our influence as an investor and purchaser.

At Aviva we promote a fair and respectful culture in which differences are valued. Within our senior management group, representation of female colleagues was maintained at 22% in 2009. We were recognised in The Times/Aurora Where Women Want to Work Top 50 list in 2009 and featured in Cranfield University's study of women in the boardroom.

Our employee groups, including the Aviva Women's Network and Pride Aviva, our network for gay, lesbian and bisexual employees, are firmly established. This year, we

significantly improved our position in Stonewall's Workplace Equality Index, achieving 54th position, compared to 84th in 2008. Pride Aviva also received special recognition in the survey as a "Star-Performing Employee Network".

Our influence as a purchaser of goods and services is significant, with an annual spend of approximately £6.1 billion. Our group policy on purchasing and supply management includes key standards on labour and human rights. To work with Aviva, we require that our suppliers sign the Aviva Supplier Code of Conduct, either upon appointment or contract renewal.

Last year we reported that 983 suppliers had signed up to our code of conduct. This was adjusted to 233 suppliers due to a statement of compliance from one of our businesses which could not be validated. We have set in place a challenging target to sign up 1,750 suppliers in 2010. In addition, we question our major suppliers on their commitment to CR. In 2009 138 detailed assessments took place, exceeding our target of 100. We have set a target to assess 200 major suppliers globally this year.

More information about our purchasing and supply chain indicators can be found in our [CR Report 2009](#).

Our group policies on [People](#), [CR](#) and [Purchasing and Supply Management](#) embody these principles.

Outcomes

Every year we ask our employees to share their views about our business through our annual employee survey. This is a voluntary, anonymous survey which includes questions on employees' views of diversity and respect. In 2009, 76% of our people responded - the highest level in our history.

Key performance indicators relating to our employees' views on Aviva are based on questions in our annual global Employee Promise survey. We changed our external provider in 2009 and we now report and set targets in line with their stronger global financial service (GFS) benchmark norms. Some of the wording in our questions has changed, other questions have been replaced and we have introduced a more robust scale to measure employee responses.

To ensure consistency, we have therefore removed the historical trend data for 2007 and 2008 where this had been reported previously and amended the 2009 targets in line with GFS norms supplied by our current provider.

Full details on our [employee survey results](#) including targets for 2010 can be found in our CR Report 2009.

People

| Key indicators | 2009 | Status |
|---|------|---|
| % of employees who feel that Aviva is committed to attracting, developing and keeping a diverse workforce* | 52% |  |
| Percentage of staff who feel that employees in the businesses are treated with respect, regardless of their position* | 67% |  |

* Global Employee Promise survey responses, 2009.

 Missed target

 Met/exceeded target

Labour standards

| 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 | eliminate discrimination in respect of employment and occupation. |

Actions

We want to support and inspire our people to be the best they can be. To do this we need to respond to everyone as individuals, understanding their point of view and responding to their concerns. To achieve our aims, human resources teams around the business ensure we comply with our own policies, such as the group [People strategy](#), as well as the relevant employment laws.

Aviva provides formal mechanisms across the group that help to engage and involve our employees, including ways of meeting local legal requirements on consultation and exchanging information. We have a number of employee forums including the

European Consultative Forum, which has the aim of establishing dialogue on pan-European issues. Where trade unions are recognised or where collective bargaining is in place, the formal mechanisms should reflect this.

Recruitment and selection at Aviva follows a process that supports fairness, openness and is non-discriminatory. See above for more details.

Outcomes

Our global Employee Promise survey gives employees the opportunity to provide feedback on their experience working with Aviva, focusing on how they think we lead, manage and engage with them. In 2009 we engaged 76% of our employees worldwide, up 2% on 2008 and the highest response rate in our history. A detailed analysis of our Employee Promise results in 2009 including views on leadership, levels of engagement and customer focus can be found in the [employee survey results](#) section of our CR Report 2009.

Environment

| 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. |

Actions

Aviva is committed to managing its direct and indirect impacts on the environment. Our [Group Environmental policy](#) sets out how we engage to meet the various environmental challenges and opportunities in line with our commitment to good environmental practice and innovation.

The insurance industry has a fundamental part to play - for example, using our historical knowledge of weather events to map and understand likely impacts, and providing the financial instruments to enable risks to be pooled and transferred.

Addressing climate change is Aviva's most pressing environmental priority and we are committed to help mitigate the threat and support society to adapt to changes caused by man-made emissions already in the atmosphere. Our climate change strategy has

three spheres of focus:

- Our sphere of control - reducing operational emissions through our carbon management programme.
- Our sphere of influence - encouraging sustainable choices among customers, suppliers and the companies we invest in.
- Our sphere of concern - working externally to reach consensus on ways forward for companies, policymakers and other stakeholders.

We achieved a reduction in carbon emissions of 15%, compared to a 3.3% reduction in 2008. Taking account of our divestments, on a like-for-like basis our total carbon emissions fell by 5.2% across our global business, compared to a 6.6% reduction in 2008. We continue to pursue our goal to incrementally reduce carbon emissions on an annual basis and have set a reduction target of 5% for the coming year.

For the first time we have set ourselves a long-term carbon reduction goal - to reduce our carbon emissions by 30% by 2020 from the 2006 baseline. Through our products, services and business activities we're also committed to play our part in society's transition to a low carbon economy.

Aviva has joined the top level of companies publicly reporting their carbon management performance through our inclusion in the Carbon Disclosure Leadership Index. We are ranked third in the FTSE financial services sector and are eighth in the FTSE 350 overall.

We gained accreditation to the Carbon Trust Standard this year for our UK business operations. It's a key milestone for us in preparation for the Carbon Reduction Commitment, the UK government's mandatory cap and trade scheme to which non energy-intensive businesses including Aviva will be subject.

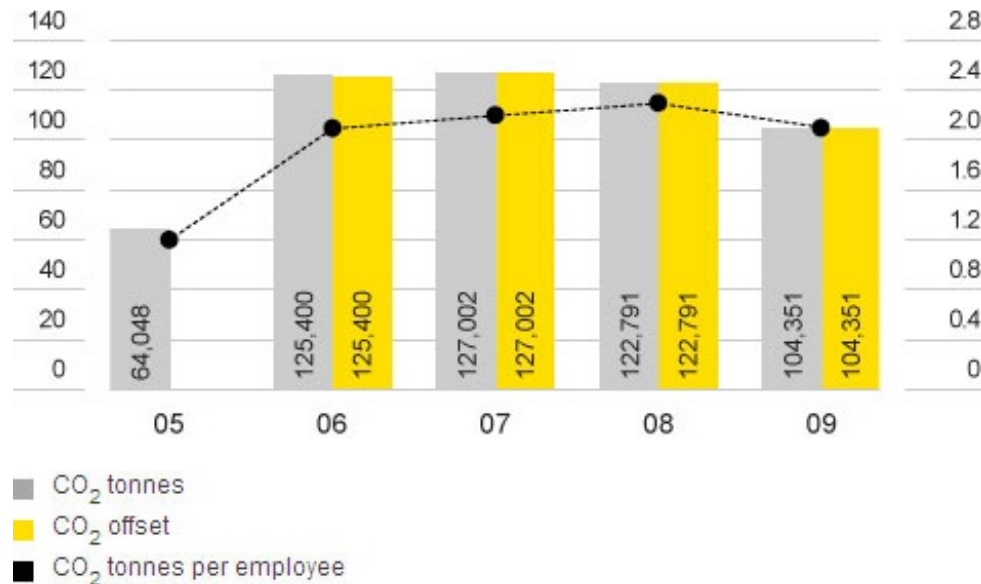
Aviva Investors, our global asset management business, is a leader in sustainable and responsible investment. It plays an important role in encouraging companies to engage with climate change via the Carbon Disclosure Project (CDP) - a global initiative that it helped to establish. Please see our [CR Report 2009](#) for more information.

Detailed information on our approach to carbon management, influencing sustainable choices amongst our customers and suppliers and our role in public debate on environmental issues is available in our [CR Report 2009](#). We also report our performance using Accounting for Sustainability's [connected reporting framework](#) which integrates financial and non-financial data to provide a comprehensive picture of our impacts. We were one of the first companies to help develop the framework and have used this approach for environmental reporting in our Annual Report and Accounts since 2007.

Outcomes

| Key indicators | 2008 | 2009 | Change over year |
|--|---------|---------|------------------|
| CO ₂ emissions (tonnes) - actual | 122,791 | 104,351 | ● (15%) |
| CO ₂ emissions (tonnes) - based on 2009 ownership | 110,051 | 104,351 | ● (5%) |
| Water consumption (m3) - absolute | 843,750 | 751,750 | ● (11%) |
| Waste generated (tonnes) - absolute | 19,311 | 14,592 | ● (24%) |
| Proportion of recycled waste | 84% | 69% | ● (15%) |

- Met/exceeded target
- Missed target



We want to show clearly that we have reduced our emissions as a result of energy management and behavioural change and not merely due to divestments. The KPI for "Actual emissions" are absolute emissions for total Aviva operations in each year

stated while the KPI with "emissions based on 2009 ownership" show our emissions over the last two years based on operations that we have in 2009 allowing for a like-for-like comparison. Water has been restated following an independent review of Aviva Canada's water consumption between 2006 and 2008. This has increased the overall group consumption figures.

Visit the [environment section](#) of our CR Report 2009 to view further examples of Aviva's performance in this area.

Anti-corruption

Anti-corruption

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

Actions

We aspire to the highest standards of conduct and set out our principles in our business ethics code. This stipulates fairness, honesty and transparency in all we do. Everyone at Aviva has a part to play in upholding our standards and we raise awareness of these responsibilities through our induction programmes and acceptance and sign-off of the code by all staff.

Combating financial crime in all its forms is an important part of operating ethically. We have a zero tolerance approach to fraud and all forms of financial crime.

Our [financial crime policy](#) applies across the group and meets all the requirements of applicable legislation, regulatory guidance and industry best practice. All allegations of fraud, corruption and market abuse are subject to independent investigation. It works to ensure that risks to the business and our customers relating to fraud, money laundering, market abuse and bribery and corruption are adequately controlled. We carry out mandatory computer-based training on core topics to give colleagues a clear understanding of our procedures and their obligation to follow them exactly. In 2009 we enhanced our bribery and corruption controls and rolled out a worldwide training programme.

As an organisation we will actively investigate any incidents of malpractice or fraud by our employees and seek to prosecute those that fall below the standards that Aviva expects of them. While all employees are encouraged to report any incidents through line management, we have also provided an independent malpractice reporting facility (known as Right Call) through which any employee across the group can raise a concern. Reports by employees are handled confidentially and independently investigated.

Outcomes

Rightcall is our 24-hour confidential reporting service for employees to report instances of suspected fraud. Employees can contact the service by free phone, email or internet in their own language.

During 2009 there were 67 incidents recorded through Right Call, all of which were referred for independent investigation. At the time of writing, 51 have been resolved and 16 are still under investigation. Within the UK 12 employees were dismissed in 2009 as a consequence of their fraudulent activities.

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