

Aviva's Communication on Progress to the UNGC-2016

Company profile and context of operations:

https://www.aviva.com/media/upload/Strategic_Report_2016.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/>

<https://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/media/upload/Corporate_Responsibility_Environment_and_Climate_Change_Business_Standard-2015.pdf

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

- Other established or emerging best practices

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

<https://www.aviva.com/responsible-sustainable-business/our-sustainable-business-strategy/>

Criterion 2: The COP describes value chain implementation

- Communicate policies and expectations to suppliers and other relevant business partners

https://www.aviva.com/media/upload/Aviva_Business_Code_of_Behaviour_-_October_2016_3.pdf

<http://www.aviva.com/corporate-responsibility/trust-and-transparency/supply-chain/>

https://www.aviva.com/media/upload/Procurement_and_outsourcing_business_standard.pdf

https://www.aviva.com/media/upload/Modern_Slavery_Act_statement_2016_2.pdf

https://www.aviva.com/media/upload/SupplierPolicy_150208.pdf

- Undertake awareness-raising, training and other types of capacity building with suppliers, investors and other business partners

https://www.aviva.com/media/upload/Aviva_Business_Code_of_Behaviour_-_October_2016_3.pdf
<http://www.aviva.com/responsible-sustainable-business/responsible-investment/>
<http://www.aviva.com/corporate-responsibility/our-approach/stakeholder-engagement/>

- Other established or emerging best practices

In 2016 we conducted a survey with a sample of 300 of our suppliers, selected based on risk criteria, which included a large percentage of our managed supply. They were engaged through a survey that included questions relevant to assessing the risks of Modern Slavery. The results of this survey will guide our engagement with suppliers in 2017.

https://www.aviva.com/media/upload/Modern_Slavery_Act_statement_2016_2.pdf

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)

https://www.aviva.com/media/upload/Annual_Report_and_Accounts.pdf (Page 60)
https://www.aviva.com/media/upload/Our_Human_Rights_Policy.pdf

- 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
<https://www.aviva.com/media/upload/04-2015-aviva-policy-on-cluster-munitions.pdf>
https://www.aviva.com/media/upload/CR_climate_change_and_environment_business_standard.pdf
https://www.aviva.com/media/upload/People_business_standard.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
<https://www.aviva.com/media/upload/04-2015-aviva-policy-on-cluster-munitions.pdf>
https://www.aviva.com/media/upload/CR_climate_change_and_environment_business_standard.pdf
https://www.aviva.com/media/upload/People_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

https://www.aviva.com/media/upload/Strategic_Report_2016.pdf (page 60)
https://www.aviva.com/media/upload/CR_climate_change_and_environment_business_standard.pdf
<https://www.aviva.com/responsible-sustainable-business/our-people/inclusive-diversity/>
<https://www.aviva.com/responsible-sustainable-business/policies/>

- Operational-level grievance mechanisms for those potentially impacted by the company's activities

https://www.aviva.com/media/upload/Business_Ethics_Code_August2016.pdf
(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

https://www.aviva.com/media/upload/Governance_Committee_Terms_of_Reference_March_17.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

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

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/>
https://www.aviva.com/media/upload/Aviva_Business_Code_of_Behaviour_-_October_2016_3.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).

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

- Inclusion of reference to relevant international labour standards in contracts with suppliers and other relevant business partners

https://www.aviva.com/media/upload/Our_Human_Rights_Policy.pdf
https://www.aviva.com/media/upload/Aviva_Business_Code_of_Behaviour_-_October_2016_3.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).

<https://www.aviva.com/responsible-sustainable-business/our-stories/living-wage/>

In 2016 Aviva Group's Stuart Wright, Group Property and Facilities Director at Aviva, was appointed Chair of the Living Wage Foundation Advisory Council.

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

- Allocation of responsibilities and accountability within the organization
https://www.aviva.com/media/upload/Strategic_Report_2016.pdf (Pages 30-33)
https://www.aviva.com/media/upload/People_business_standard.pdf
- Internal awareness-raising and training on the labour principles for management and employees
<http://www.aviva.com/responsible-sustainable-business/our-people/>
https://www.aviva.com/media/upload/Our_Human_Rights_Policy.pdf
https://www.aviva.com/media/upload/Business_Ethics_Code_August2016.pdf
- Active engagement with suppliers to address labour-related challenges
https://www.aviva.com/media/upload/Our_Human_Rights_Policy.pdf
https://www.aviva.com/media/upload/Aviva_Business_Code_of_Behaviour_-_October_2016_3.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

<https://www.avivaworld.com/en/OurCompany/OurBusinesses/AvivaGroupCentre/Group%20InvestigationsSite/Pages/RightCall.aspx>
https://www.aviva.com/media/upload/Business_Ethics_Code_August2016.pdf

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.

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-aviva/experienced/procurement>
https://www.aviva.com/media/upload/Annual_Report_and_Accounts.pdf (Page 310-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

https://www.aviva.com/media/upload/CR_Reporting_Criteria_2016.pdf (suppliers KPIs)
https://www.aviva.com/media/upload/Aviva_Business_Code_of_Behaviour_-_October_2016_3.pdf

- 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

https://www.aviva.com/media/upload/Aviva_Business_Code_of_Behaviour_-_October_2016_3.pdf

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)

https://www.aviva.com/media/upload/Aviva_-_ClimateWise_response_2016_-_final.pdf
https://www.aviva.com/media/upload/Avivas_strategic_response_to_climate_change_-_2016_update_ysSf6TN.pdf

- Reflection on the relevance of environmental stewardship for the company

<https://www.aviva.com/responsible-sustainable-business/climate-risks-and-environmental-impacts/>
https://www.aviva.com/media/upload/Annual_Report_and_Accounts.pdf

(Page 10, 61)

https://www.aviva.com/media/upload/Aviva_-_ClimateWise_response_2016_-_final.pdf
https://www.aviva.com/media/upload/Avivas_strategic_response_to_climate_change_-_2016_update_ysSf6TN.pdf

- Written company policy on environmental stewardship

<http://www.aviva.com/responsible-sustainable-business/climate-risks-and-environmental-impacts/>

https://www.aviva.com/media/upload/Aviva_-_ClimateWise_response_2016_-_final.pdf

https://www.aviva.com/media/upload/Aviva_Investors_Stewardship_and_Responsible_Investment_Policy_2017.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

<https://www.aviva.com/responsible-sustainable-business/climate-risks-and-environmental-impacts/climate-risks/>

- 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 years 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

- Aviva's strategic response to climate change

https://www.aviva.com/media/upload/Avivas_strategic_response_to_climate_change_-_2016_update_ysSf6TN.pdf

- Environmental risk and impact assessments

https://www.aviva.com/media/upload/AVI1_0042_AR_170315_TCFD_Pages_wnX1NfX.pdf

- 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

https://www.aviva.com/media/upload/CR_climate_change_and_environment_business_standard.pdf
/

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

- System to track and measure performance based on standardized performance metrics

https://www.aviva.com/media/upload/Corporate_Responsibility_Summary_2016_Financial.pdf

https://www.aviva.com/media/upload/CR_climate_change_and_environment_business_standard.pdf

Robust Anti-Corruption Management Policies & Procedures

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

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.

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.

Our Financial Crime Standard is available internally.

- Publicly stated formal policy of zero-tolerance of corruption
- Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes
- Policy on anti-corruption regarding business partners
- Detailed policies for high-risk areas of corruption

https://www.aviva.com/media/upload/Business_Ethics_Code_August2016.pdf
https://www.aviva.com/media/upload/Internal_control_business_standard.pdf

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

- Support by the organization's leadership for anti-corruption

- Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees
- Internal checks and balances to ensure consistency with the anti-corruption commitment
- Management responsibility and accountability for implementation of the anti-corruption commitment or policy
- Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice

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

(See Internal Controls Standard and Business Ethics Code, which all employees are required to sign up to annually)

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. 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.

Launch - Google Chrome
https://aviva.csod.com/lms/scorm/clientLMS/ScormFrames.aspx?aiicc_sid=920891aviva&aiicc_url=https://aviva.csod.com/LMS/scorm/aiicc.aspx

AVIVA
Essential Learning

Essential Learning
Welcome Save & Exit

Essential Learning

The Essential Learning programme covers nine topics.

It consists of individual topic assessments and affirmations (an affirmation is your confirmation that you've read and understood the learning for that topic).

If you're confident of your knowledge of the topics, you can go straight to the assessment, but if you don't pass it first time, you'll have to review the learning material before you can re-take the assessment.

Click on the start button below to begin.

Start

	Wellbeing	<input type="checkbox"/>
	Diversity	<input type="checkbox"/>
	Health and Safety	<input type="checkbox"/>
	Anti-Bribery and Anti-Corruption	<input type="checkbox"/>
	Financial Crime	<input type="checkbox"/>
	Data Protection Act	<input type="checkbox"/>
	Security and Business Continuity	<input type="checkbox"/>
	Customer Conduct Risk	<input type="checkbox"/>
	Business Ethics Code	<input type="checkbox"/>

Key:

<input type="checkbox"/>	Not attempted
<input checked="" type="checkbox"/>	Passed
<input checked="" type="checkbox"/>	Failed
	Click to review topic

Menu

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
https://www.aviva.com/media/upload/Business_Ethics_Code_August2016.pdf

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

<https://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/>

<https://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/>
[https://www.aviva.com/media/upload/Corporate_Responsibility_Summary_2016_Final.p
df](https://www.aviva.com/media/upload/Corporate_Responsibility_Summary_2016_Final.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
- 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

<https://www.aviva.com/responsible-sustainable-business/our-stories/>
<https://www.aviva.com/responsible-sustainable-business/our-stories/aviva-community-fund/>
<http://www.aviva.com/responsible-sustainable-business/our-commitments/>
<http://www.aviva.com/media/thought-leadership/climate-change-value-risk-investment-and-avivas-strategic-response/>

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
- CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards

<https://www.aviva.com/responsible-sustainable-business/our-stories/supporting-the-un-global-goals-for-sustainable-development/>
<https://www.aviva.com/media/thought-leadership/>

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.
- Board (or committee), where permissible, approves formal reporting on corporate sustainability
- The Board oversees development of corporate sustainability strategy, defining goals and overseeing implementation

<http://www.aviva.com/investor-relations/corporate-governance/board-of-directors/board-committees/governance-committee/>
https://www.aviva.com/media/upload/CR_Governance_Structure_-_2016.pdf
https://www.aviva.com/library/2016ar/pdf/downloads/Full_Annual_Report_2016.pdf
(page 100)

Criterion 21: The COP describes stakeholder engagement

- Define sustainability strategies, goals and policies in consultation with key stakeholders
- 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
https://www.aviva.com/media/upload/Business_Ethics_Code_August2016.pdf

Women's Empowerment

In 2016, gender diversity was a big focus for us. Mark Wilson, Group CEO, was the first FTSE 100 CEO to sign up to the Executive Committee commitment outlined by the 30% Club - a commitment for 30% of our Group Executive to be women by 2020.

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

https://www.aviva.com/library/2016ar/pdf/downloads/Full_Annual_Report_2016.pdf (See pages 32, 89, 85 and 310)

<https://www.aviva.com/responsible-sustainable-business/our-people/women-in-finance-charter/>

<https://30percentclub.org/press-releases/view/aviva-commits-to-new-30-club-target>

https://www.aviva.com/media/upload/People_business_standard.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

https://www.aviva.com/media/upload/Aviva_Business_Code_of_Behaviour_-_October_2016_3.pdf

https://www.aviva.com/library/2016ar/pdf/downloads/Full_Annual_Report_2016.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

https://www.aviva.com/library/2016ar/pdf/downloads/Full_Annual_Report_2016.pdf

<http://www.rosauk.org/our-partners/>

<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
https://www.aviva.com/library/2016ar/pdf/downloads/Full_Annual_Report_2016.pdf (Page 75)