

Aviva is the world's sixth largest insurance group; providing 44.5 million customers with insurance, savings and investment products, with total worldwide sales in 2010 of £47.1 billion. Aviva is the UK's largest insurer with over 14 million customers. Aviva plc is in the top 10% of socially responsible companies globally in the Dow Jones Sustainability World Index.

Aviva Investors is the global asset management business of Aviva plc; operating in 14 countries in Asia Pacific, Europe, North America and the United Kingdom, with assets under management of £269 billion at 30 June 2011.

Corporate Sustainability Reporting Coalition

- In 2011 Aviva convened the Corporate Sustainability Reporting Coalition *representing investors with assets under management of approximately US\$2 trillion, as well as financial institutions, professional bodies, NGOs and other relevant stakeholders.*
- The Coalition is urging all United Nations member states to commit to develop a Convention on Corporate Sustainability Reporting at the 2012 UN Conference on Sustainable Development (Rio+20).

Feedback on the zero draft

Aviva Investors, along with the other members of the Corporate Sustainability Reporting Coalition, are very encouraged to note that paragraph 24 of zero draft document states:

“We call for a global policy framework requiring all listed and large private companies to consider sustainability issues and to integrate sustainability information within the reporting cycle.”

While we warmly welcome this initial positive step, we do believe there is still some way to go; most notably:

1. We believe the outcome text needs to be more **action-orientated**.
 - We are calling for a commitment to develop a Convention on Corporate Sustainability Reporting at the UN Conference on Sustainable Development.
 - As such, we would welcome the inclusion of a clear commitment to begin the work of designing a global policy framework, including an indicative timeframe for completion.
2. We believe the role of the **private sector** needs further highlighting.
 - It has been demonstrated that there is a direct correlation between sustainable business practices and the longer-term financial success of a company.
 - We are calling for national regulations which mandate (listed and large private) companies to integrate material sustainability issues within their Annual Report and Accounts – on a “comply or explain” basis.
 - Such a requirement would stimulate substantive board discussions on the risks and opportunities arising from sustainable development and subsequently better integration of sustainability within their operations.
 - We support companies utilising the excellent work already undertaken by Global Reporting Initiative, Global Compact, UNCTAD, and the International Integrated Reporting Committee.
3. We believe there needs to be a stronger emphasis placed on **accountability**.
 - We believe there should be effective mechanisms for investors to hold companies to account on the quality of their disclosures; for instance through an advisory vote at the AGM.
 - Such a mechanism would engage companies and investors in a dialogue that, over time, will lead to more oversight of company performance and comparability between companies.

Our suggested wording to replace the current paragraph 24 is:

“We commit to the development of a Convention that provides a global policy framework fostering the development of national measures mandating the integration of material sustainability issues within the corporate reporting cycle, on a comply or explain basis as an important step towards integrated reporting. We will also promote consideration of effective mechanisms for investors to hold companies to account on the quality of their disclosures, including for instance through a vote at the AGM.”

We look forward to continued engagement with the UNCSD Preparatory Committee, Member States and other stakeholders to ensure we make the most of the opportunity that the Rio+20 summit presents; focusing on action and implementation; communicating how a green economy and long term sustainable growth go hand in hand.

Corporate Sustainability Reporting Coalition

The Corporate Sustainability Reporting Coalition (CSRC) was convened by Aviva Investors in September 2011. Paul Abberley, Chief Executive of Aviva Investors London launched the Coalition's call to action at the *United Nations Private Sector Forum on Sustainable Energy for All*, which was held in conjunction with the 66th Session of the UN General Assembly.

The CSRC represents financial institutions, professional bodies, NGOs and investors with assets under management of approximately US\$2 trillion. It includes organisations as diverse as the Association of Chartered Certified Accountants, Global Reporting Initiative, Hermes and the Carbon Disclosure Project which acts on behalf of 551 institutional investors, holding US\$71 trillion in assets under management.

Members of the CSRC include (although is not limited to):

Aviva plc	Global Reporting Initiative
Aviva Investors	Hermes
Association of Chartered Certified Accountants	Illac Ltd
BT Pension Scheme Management Limited	MN-Services
CA Cheuvreux	Numai Partners
Carbon Disclosure Project	PaxWorld Management LLC
Calvert Investment	Rabobank Pensionfund
Ceres	Sparinvest Group
Church of Sweden	Stakeholder Forum
Climate Change Capital	The Co-operative Asset Management
Colonial First State Global Asset Management	Traidcraft
CorporateRegister.com Limited	Trillium Asset Management, LLC
Cyrte Investments	Triodos Investment Management B.V.
Delta Lloyd Asset Management	UNCTAD*
EIRIS	UN Global Compact
Environment Agency Active Pension Fund	University of St Andrews Endowment Fund
Ethos Foundation	Via Gutenberg
Fronesys	Vigeo
FRR Fonds de réserve pour les Retraites	VIP eV
FTSE	WWF-UK
Generation Investment Management	More to come.....

* these organisations have developed their own position statement on this initiative which is available on line - www.unctad.org/WIR

The measure we are proposing offers an opportunity not only to improve the long-term profitability of corporations, but to also improve returns to their investors. It should improve the quality of markets they are listed on, increase macro financial stability and make a material contribution to the lives of those impacted, as we all are, by corporate activity.

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