

Reporting criteria for Corporate Responsibility key performance indicators

Introduction

This Corporate Responsibility (CR) Reporting Criteria document sets out the principles, criteria and scope used to report all CR KPI data by Aviva Plc, its subsidiaries and joint ventures (together known as the Group) in the annual CR section of the Annual Report and Accounts and Corporate Responsibility Report.

It is the responsibility of the Group's management to ensure that appropriate procedures are in place to prepare its CR reporting in line with, in all material respects, these reporting criteria.

CR data is reported aligned with the Group's financial reporting periods, i.e. years ending 31 December.

The annual report and accounts contains a summarised description of how we manage and measure our performance. A more detailed report on our material issues can be found on our online CR Report.

General reporting principles

In preparing these reporting criteria, consideration has been given to the following principles:

- We report data on issues relevant to our corporate responsibility commitments
- Data is as accurate and complete as practical and feasible
- Assumption or estimations are stated and explained
- Consistent boundaries and methodologies are used wherever possible to allow comparison over time and across different businesses.

Organisational boundary for CR reporting

CR Reporting covers Aviva plc, its subsidiaries and joint ventures. All figures in our report, unless otherwise stated, cover the period from 1 January to 31 December.

Scope

What follows is the basis of preparation for the CR key performance indicators.

Employee Promise Survey (EPS)

Data for some of the KPIs that appear in the below list is obtained through our annual EPS. Please see below the common criteria applicable to all of them.

Key performance indicators relating to our employees' views on Aviva are based on questions in our annual global EPS. We outsource the running of the survey to an external provider. We report and set targets in line with their global financial service (GFS) benchmark norms. This covers 100% of employees including those in our joint venture partners.

The EPS has a 5-point Likert scale ranging from strongly disagree through to strongly agree for each question. For reporting, the number of people choosing a particular point on the 5-point

scale is divided by the total number of responses to the item (across all options on the 5-point scale). This is then expressed as a percentage, e.g. If 100 total people answered a particular item and 27 of those people selected “Strongly agree”, the score for “% Strongly Agree” would be reported as 27%. The responses for “Strongly Agree” and “Agree” are aggregated to produce a result for “% Favourable”. E.g. if 100 total people respond to a particular question with 27 choosing “Strongly Agree” and 32 choosing “Agree”, the % Favourable score would be reported as 59%. The same calculations are completed for each point on the 5-point, while “Disagree” and “Strongly Disagree” are aggregated to produce a “% Unfavourable” result score. The % Favourable results for particular questions are reported each year in Aviva’s Annual Report and the annual Corporate Responsibility report.

Definition of employee

For the purposes of the EPS, 'employees' were considered to be those who, at the time of the survey, were:

- All individuals on the Aviva payroll in all markets, including those within joint venture partners
- Contractors employed directly by Aviva and on the Aviva payroll. Contract staff working for Aviva but who are not paid directly by Aviva, e.g. part of an external consultancy or employment agency, are ineligible to participate in the Employee Promise Survey
- Individuals meeting the requirements above and with a hire date on or before 3 August 2012.

Individuals hired on a temporary basis – including fixed terms of less than 12 months – are ineligible to participate in the EPS. This includes temporary staff hired as cover for Aviva employees on short-term or long-term leave.

KEY INDICATORS

Trust and transparency

Business ethics

KPI: % of employees signing of receipt, understanding and acceptance of the business ethics code on an annual basis

Each year we ask all employees to read and agree to the business ethics code (the Code). (http://www.aviva.com/library/pdfs/cr/aviva_bus_ethics_code.pdf/)

The Code sets out the behaviour we expect all employees to abide by. It covers bribery and corruption, political donations and how we should treat our employees by way of example.

All employees are asked to sign the code including:

- Directly employed full and part time staff
- Temporary staff
- Employees within a joint venture company
- Staff on maternity leave and long term sick leave.

Aviva has a 100% target for employee sign-off of receipt, understanding and acceptance of the Code on an annual basis. However, it is understood that due to factors outside the control of businesses (e.g. long-term sick leave, maternity, etc) some employees may not be able to sign the Code in a given year. To provide for this, group has established a 5% risk tolerance level for each business unit and the aggregated figure. However, the figure we report is based on actual % sign-off on the Code.

Employees sign the Code in different markets at different times of the year to suit their needs. As an exception to this in Aviva France during 2012, the Code was added as an appendix to the internal employee rules of conduct, which are part of the employment contract. Therefore, Aviva France is not required to be part of this KPI.

KPI: % of employees completing the Bribery and Corruption training

Employees asked to sign complete training include:

- Directly employed full and part time staff
- Temporary staff and contractors (who are due to be working for Aviva for a minimum of three months)
- Employees within a joint venture company.

Those on maternity leave and long term sick leave would be expected to complete the training on their return to the company.

All employees were asked to complete the training upon the implementation of the UK Bribery Act 2010. Training is included in the Essential Learning module run through Aviva's internal learning management system in the UK and staff are asked to complete this on an annual basis. In other markets, employees are asked to complete the training upon joining the company, and this is delivered by the chosen training supplier.

In order to determine the completion rate of the anti-bribery and corruption training since launch, to date the management information is reviewed via the external training supplier's database and the essentials learning database for each market and the global total completion rate is calculated from the individual results.

Customers

KPI: % of business that are in or above the upper quartile relative to the local market average (NPS score)

This KPI comes from the annual relationship "NPS" survey, which is benchmarked against local competitors. This survey is conducted and analysed by an external research provider, who calculate the outcomes reported externally. Our target is for all markets to reach upper quartile compared to market average.

"Net promoter score (NPS)" is the difference between the percentage of customers who are our promoters (i.e. advocates who would recommend Aviva to friends and colleagues) and those who are our detractors (i.e. customers who would not recommend Aviva or would even speak out against Aviva). Measured on a scale from 0-10, NPS is calculated by subtracting detractors (scores 0 – 6) from promoters (scores 9 – 10). It includes a representative sample of

the entire customer base (this should include direct, intermediated and white-label customers).

KPI: % of employees who rate us favourably on customer index

Information gathered through our EPS. It is based on the following customer and product questions that aggregate into a customer index score:

- Q.1. I would recommend our products and services to my family and friends
- Q.2. We regularly use customer feedback to improve our processes
- Q.3. Where I work, we set clear performance standards for our products and service quality
- Q.4. I always consider how my actions impact Aviva's external image and reputation.

Climate change and environment

Scope of reporting

Our environment and climate change data covers 100% of the Aviva subsidiaries and joint ventures where we have operational control (Under the operational control approach, a company accounts for 100% of emissions from operations over which it or one of its subsidiaries has operational control). Our data is presented on an absolute basis, unless otherwise stated. We also include other metrics such as square metres of floor space, gross written premiums and employee numbers so that the reader is able to calculate our carbon, water, or waste intensity based on their chosen metrics.

It should be noted however that employee number used are total employees rather than the FTE number quoted in the Annual Report & Accounts, which are calculated according using an equity share basis in line with the preparation of the remainder of the Annual Report and Accounts. This means that the employee figures quoted in this area are often much higher than the full time equivalent figures (FTE) used in the Annual report and accounts. The total employees figure should be used for any per employee environmental impact intensity calculations made.

The environmental data is collected and aggregated to provide a groupwide picture based on a combination of actual, extrapolated and estimated data, depending on the type of data and the market the data comes from. This basis of the data is sourced from invoices, supplier reports, and expenses systems. Emissions sources and data sources:

- electricity - invoices, supplier reports, in market extrapolation and extrapolation over time periods due to invoicing arrangement
- gas - invoices, supplier reports, in market and extrapolation over time periods due to invoicing arrangement
- oil- invoices
- fugitive emissions from air-conditioning - based on invoices from the provision of top up gases
- municipal heating & cooling – invoices
- air travel - invoices, extrapolation from expenses systems
- rail - supplier reports
- grey fleet - expenses system

- company car - expenses system and invoices
- hire car - supplier reports
- water consumption - invoices, supplier reports, extrapolation over time periods and on an FTE and m2 basis
- landfill waste - supplier reports, invoices and extrapolation over time periods and over time periods
- electricity consumption from outsourced data centres - outsourced data centre business partner carbon reporting process.

We use third party invoices where possible, to promote data accuracy and consistency, and only use proxy data or extrapolate in the absence of invoices.

Any currency figures mentioned in our reporting are in £ sterling unless otherwise indicated.

We take the average annual currency exchange figures provided by the Aviva Group Finance for the year in question.

Organisational reporting boundaries

If a business is acquired during the year, the business will report its environmental impact in the first full year of ownership. If the group divests a business during the year and the sale takes place in the first half of the year we will not include the business in the reporting for the year. If the sale occurs in the second half of the year we will report on a full year ownership equivalent basis.

We use a baseline year for our long term reduction targets. If company divestments or acquisitions create a difference of +/-10% of the Group total emissions then the baseline year will be reset.

The availability and quality of data from individual data points varies from country to country. The focus of data collection is primarily from sources generating carbon dioxide emissions or equivalents.

CO2e emissions

All our emissions data from energy, travel, air conditioning, water consumption and treatment, and waste to landfill is measured in carbon dioxide equivalent (CO2e) unless otherwise stated. We use the Department for Environment, Food and Rural Affairs (Defra) latest factors that are annually revised for our emissions factors:

<http://www.defra.gov.uk/publications/files/pb13773-ghg-conversion-factors-2012.pdf>

The CO2e factor which changes most frequently are the electricity related CO2e emission factors, however we will not restate our prior year carbon data due to variations in the electricity carbon conversion factors, unless overall on a group wide basis this causes a movement of more than 5% year on year or relative basis. In order to calculate our relative emissions, we account for emissions for acquisitions or divestment which have occurred in the previous year, so that we are comparing the structure of the business and emissions on relative or like for like. Details of specific changes in a particular year are provided in the notes on the KPI page of the Annual Report & Accounts and Corporate Responsibility Report.

We report our carbon emissions due to global recognised Scopes.

- Scope 1 - operational emissions from owned sources - these are gas, oil, company car mileage, fugitive emissions from air conditioning
- Scope 2 - operational emissions from non-owned sources - these are electricity, municipal heating and cooling
- Scope 3 - Operational emissions from non-owned sources - these are business travel (air, rail, grey fleet, rental cars), water, landfill waste and electricity consumption from outsourced data centres where consumption figures are available. Energy is measured or converted into kWh, fugitive emissions are measured in kilograms (kgs), travel is measured or converted into kilometres (kms), water is measured in m3, and waste is measured in metric tonnes.

Car travel

The measurement of km is the most common method of collecting data in terms of car travel. This is normally collected through the expenses system which reimburses employees on a cost per km travelled basis. This applies to both company cars and private cars used for business (the grey fleet). Where businesses are not able to report on kms travelled, but can report on litres of fuel used, we take this unit to calculate the associated CO2e emissions. Where businesses provide both we use the kms data in preference.

Exclusions

We do not include employee commuting in our boundaries for reporting. However, we work with public transport providers in the locality of our larger offices to assist commuting. We do not include outsourced operations where we have no operational control, with the exception of the data centres that we outsourced.

Environmental breaches

We report on any breaches in local environmental regulations that occur from our operations.

KPIs:

% of remaining CO2e emissions offset annually

CO2e emissions (tonnes) - absolute

CO2e emissions (tonnes) - relative

Carbon offsetting of remaining emissions

In the last quarter of the reporting year we select the carbon credit supplier we will work with to account for our operational carbon emissions created over the year. We calculate our operational CO2e annually at the end of a calendar year. We then add a 5% buffer to the total to ensure we have allowed for any estimation. We purchase Gold Standard and Voluntary Carbon Scheme carbon credits from energy efficiency and renewable energy generation projects from the Voluntary carbon market. On purchase, the credits are immediately retired to the respective carbon registry, so they cannot be used or sold again. We choose projects, which not only reduce the amount of carbon being produced, but also have a high social impact. Please refer to our Corporate Responsibility Report for further detail on the criteria we apply to this process.

KPI: *Water consumption (m3) - absolute*

Water is measured or converted into m3. We report data where it is reported to Aviva Group by the Aviva markets. Where actual data from meter readings and invoices is not available but we are able to estimate or extrapolate data with a high level of confidence, we will do so. This extrapolation will be done on a per m2 floor space basis. This extrapolation may occur within a market where partial data is available, or where there is no data available from a market with similar characteristics to the one in question.

KPIs:***Waste generated (tonnes) -absolute******Proportion of recycled waste***

Waste data is collected from 14 different office-based waste streams. Where we are able to segregate waste and recycle it we do so. We report data where it is reported to Aviva Group by the Aviva markets. We measure waste in the nearest rounded up tonne. The majority of our waste figures are extrapolated from available invoices or estimated from data within the market. For reporting purposes we class any waste that is not sent to landfill as recycled. We classify recycled as waste which is reused, recycled, processed through anaerobic digestion, waste to energy.

KPI: *% of employees who feel that Aviva makes business choices that support the environment*

Data gathered through annual EPS.

Attracting and retaining talent**KPI: *% of women in senior management***

"Senior Management" is defined as the top three management levels at Aviva, SMG1 to 3, SMG1 being the CEO and his direct reports.

KPIs:

% of employees who feel that Aviva is committed to attracting, developing and keeping a diverse workforce

% of employees who feel they are treated with respect, regardless of their position

% of employees who feel we have created an environment where people with diverse backgrounds can succeed

Data gathered through annual EPS.

KPI: *% of employees who rate us favourably on leadership index*

The leadership and engagement questions are an average of a group of questions from the EPS. The leadership index consists of three questions:

- Aviva's group leadership has communicated a vision of the future that motivates me
- I understand the goals of Aviva's vision
- I trust the senior leadership team in my part of the business.

KPI: % of employees who rate us favourably on engagement index

The engagement index questions are an average of the following group of questions from the EPS:

- I would recommend my business unit/market as a good employer
- I am proud to work for Aviva
- I rarely think about looking for a new job with another company
- Overall, I am extremely satisfied with Aviva as a place to work.

Please see EPS section for details on how % are calculated.

Suppliers

It is an aspiration to report this data on a group-wide basis. The managed supply KPI's were introduced at the beginning of 2012 and are being rolled out to procurement teams in all business units. This year we are able to provide data for the UK market only.

Managed Supply is defined as the population of supply that by its nature is sufficiently important to the business that it requires active management of supply risk. All markets are required to identify its managed supply populations, for the UK this is determined by a detailed assessment of supply risk combined with supply spend, and represents at least 80% of the UK's total supply spend.

KPI: % of 'managed supply' spend where supplier signed code of behaviour

We ask our managed suppliers to sign a 'Code of Behaviour'. This Code sets the expectations of the procurement relationship and details our corporate responsibility commitments. The Code of Behaviour can be found here:

http://www.aviva.com/library/pdfs/cr/business_code_of_behaviour.pdf

KPI: % of 'managed supply' spend where supplier has successfully completed the CR element of the supplier process

Incorporated within the UK's sourcing and supply management frameworks is a requirement to complete and assess supplier responses to specific CR questions (such as CO2e emissions or waste), managed suppliers (see description above) are regularly engaged (during contract term) on their responses to these questions to determine their level of commitment to corporate responsibility.

KPI: Number of business units that use the 'supplier hospitality register' and 'register of interests'

Aviva takes ethical behaviour very seriously. Our business ethics code sets out the expected behaviours of our employees, and their responsibilities for respecting and upholding Business ethics. Part of the Code is for employees to state the hospitality that is offered to them, whether expected or not, and if they have any conflicts of interest which may impact their decision making while employed at Aviva. There are two IT based systems which are available to employees the hospitality register and register of interests are available to all employees via the Aviva Intranet. It is our ambition to make this a consistent system available to all business units.

Developing communities

KPI: Amount of Community Investment

It includes all charitable spend, value of management time, project costs, value of gifts in kind, value of marketing, and cost of volunteering. Please see below for an explanation on each of these components.

Charitable spend, £

In line with guidance for reporting on community investment issued by London Benchmarking Group (LBG) (<http://www.lbg-online.net/>), charitable spend includes the following cash categories:

- **Community:** This is a longer-term investment in a project delivered by a charity or community group. Typically the project would last one year or more, and would be delivering specified outputs and outcomes in the local community, e.g. a three year partnership with a local charity aiming to improve the education of local children.
- **One-off:** This is a short-term investment for a very specific need. For example, responding to an emergency appeal from a charity for a disaster, new roof for their building, or a piece of equipment. This would not be a 'partnership', simply a donation to a local organisation where there is no long-term relationship.
- **Commercial activity:** This is an investment in an activity that promotes the Aviva brand, a product, or service. For example, paying to place the Aviva logo on a product promotion.
- **Community sponsorship:** This involves sponsorship of a local event, team or activity in your community, such as grassroots sports, arts, or educational activities where Aviva receives marketing and PR benefits such as promoting Aviva's name in connection with the sponsorship, entry tickets to event etc.

Management time, £

This is the cost of having Aviva employees working on the community investment programme. If management of the community investment programme is just one aspect of the employee's job, we count only the proportion of the cost that relates to time spent managing the programme: e.g. If employee A's role is only 10% of standard contracted working hours on Community Investment Programme, then we will only consider for the calculation the value that this 10% represents.

For the calculation of this value we include: salary, pension, national insurance, and benefits. Please note that some markets consider only the costs of salaries for their calculations, while others include all or most of the elements mentioned above.

Project costs, £

These are the investment made in a community initiative in addition to the specified inputs such as 'Cash donations'. It mostly includes communications costs. It may also include

purchases relating to supporting activity at the project such as consultancy/agency costs, printing costs, purchase of materials (e.g. paint, gardening equipment), catering and transport costs (e.g. for volunteers), site hire (e.g. for hosting a fundraising event).

Cost of volunteering, £

Following LBG guidance, we measure two types of volunteering. Please see definitions below.

- **Volunteering in company time:** Any volunteering brokered or facilitated by Aviva and which is done during working hours or where the employee receives time off in lieu. An example of the latter would be where an employee does a half day volunteering during the weekend (employee does not work at the weekends) and the company gives him/her a half day leave in lieu.
- **Volunteering outside company time:** Any volunteering that the employee has committed to do during their own time as a result of encouragement or support from Aviva (participation in an activity supporting any of our local charity partners, for example).

Calculating the cost of volunteering

- For the purposes of calculating the cost of volunteering, we only consider the number of hours volunteered in company time and a market 'average hourly rate'. The total number of volunteering hours is multiplied by the average hourly rate. This calculation is done for each country –as average hourly rates vary from country to country- and then the totals are added up
- **Average hourly rate:** This rate is calculated by adding up the hourly rates of employees at different grades and dividing the result by the number of grades included in the sum. E.g. If there are 5 grades and they have the following hourly rates: GA £7; GB £9; GC £11; GD £13; GE £15; then the average hourly rate is £11. This is the result of GA+GB+GC+GD+GE divided by 5.

Gifts in kind, £

These are non-cash donations. Value as the cost to Aviva of making the gift e.g. write off value of IT equipment, wholesale cost of stationery donated. Where Aviva cannot work out the value, we require the charity to provide a conservative value of what they would have had to pay for this on the open market.

Value of Marketing, £

It includes investment made to support a charitable project through a marketing activity. When calculating the marketing value we include 50% of marketing spend if the prominence of the issue or charity is equal to that of Aviva for example by driving awareness or including advocacy messages. If prominence of the issue or charity is less than equal then we include only 25% of the marketing spend

KPI: Employees participating in volunteering, %

This percentage is based on number of employees in the business unit divided by number of employees volunteering. The number of employees in the business unit is the number at the

end of the year. The number of employees volunteering is based on actual volunteering, not on employees registered for volunteering activities.

For the purposes of reporting volunteering time, we consider as 'employees':

- All individuals on the Aviva payroll in all markets - including those within joint venture partners
- Contractors employed directly by Aviva and on the Aviva payroll. Contract staff working for Aviva but who are not paid directly by Aviva (e.g. part of an external consultancy or employment agency) are not included in this calculation
- Individuals meeting the requirements above and working for Aviva any time between 01 January and 31 December 2012
- Individuals hired on a temporary basis – including fixed terms of less than 12 months. This includes temporary staff hired as cover for Aviva employees on short-term or long-term leave, except in the US business where these employees are not included in this calculation.

KPI: Employee hours spent volunteering

These hours include both volunteering time in company time as well as outside company time.

Hours are tracked differently throughout the markets. Some markets use email records, others use excel spreadsheets. The UK market use Workday -an online HR system.

KPI: % of investment in Aviva Street to School

This percentage is calculated taking cash investment only. It does not include cash invested to support grassroots sports i.e. Sponsorship of amateur sports (e.g. Aviva Startrack in the UK).

KPI: % of employees who feel that Aviva does a good job of contributing to the communities in which we live and work

Data gathered through annual EPS.