



**AVIVA**

**Business Ethics Code  
July 2018**

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Appendix 1 – Group policies and business standards



This 2018 update of the Aviva Business Ethics Code has been reviewed by the Institute of Business Ethics.

## A message from Sir Adrian Montague, Chairman, Aviva

At Aviva, our values – care more, kill complexity, create legacy and never rest - are at the heart of how we do business and act as a guide whenever we decide on a course of action. Our values mean that behaving ethically and responsibly is essential to achieving success. And by acting responsibly over the long term we are there for our customers throughout their lives and make a positive contribution to our communities.

Our Business Ethics Code therefore helps us apply our Values. It sets out a practical set of principles to help us make everyday decisions and guide how we act.

By committing to these standards and practices we also help build and enhance our reputation and give ourselves the best possible chance to be trusted and respected.

Adhering to the Business Ethics Code is non-negotiable - my colleagues and I on the board of directors all agree on this point. We therefore ask that you read, understand and sign your acceptance to the Code each year. If you do not do this any annual bonus you would otherwise have been awarded will be withheld and you may face further disciplinary action.

No one will be criticised for any loss of business resulting from adhering to the Code. Equally, no employee will be prejudiced because of reporting any concerns of improper behaviour within Aviva. I therefore encourage everyone to report genuinely held concerns about any behaviour or decisions which are perceived to be unethical and in contravention of the Code.

If you have any questions, please discuss them with your manager or the Group Corporate Responsibility Director.

Sir Adrian Montague  
Chairman

## **Introduction**

As Aviva employees, we are expected to meet the highest standards of business conduct and to manage and conduct our business according to rigorous ethical, professional and legal standards.

The standards set in this Code apply to all Aviva operations around the world and we expect equivalent standards from our business partners.

The Business Ethics Code (the Code) applies to all the Group's business dealings. It is not intended to be an exhaustive guide to rules and regulations. Rather, its purpose is to provide a common understanding of the Group's ethical standards and to promote operation in accordance with these standards. Additionally, we expect **Aviva Investors employees** to abide by the Aviva Investors Code of Ethical Conduct in addition to this Code.

The principles and standards set out in the Code are fundamental to Aviva. Failure to comply with the Code may result in dismissal or other disciplinary action.

## Applying the Code

### 1) What does it mean for Aviva employees?

#### **Aviva employees**

We abide by the principles set out in the Code (as must contractors and other persons acting on behalf of the Group).

We read and sign acceptance of the Code every year by 31 of December at the latest. We understand that failure to sign up to the Code once a year will result in the automatic withholding of any annual bonus we would otherwise have been awarded and may lead to further disciplinary action.

**Aviva Investors employees** also abide by the Aviva Investors Code of Ethical Conduct in addition to this Code.

#### **Aviva line managers**

We lead by example, actively encouraging responsible behaviour.

We ensure that our team read, understand and accept the Code each year and where necessary remind them that failure to do so will result in the automatic withholding of any annual bonus they would otherwise have been awarded and may lead to further disciplinary action.

We empower our teams to conduct business in an open and honest environment in line with the Code.

We report legitimate concerns of improper behaviour or suspected wrong doing to your business unit head, Group Investigations and Forensic Audit or [Speak Up](#), our completely independent malpractice reporting service. We do not attempt to investigate a potential act of non-compliance.

#### **Aviva business unit head**

As an Aviva business unit head we have overall responsibility for compliance within our business unit. We actively support the promotion of Speak Up and ensure that the Code is comprehensively shared with all employees, and other relevant stakeholders in the business unit, such as our partners and suppliers. We ensure that:

- All new employees are provided a copy of the Code and are given access to, and directed to, the [full policies and Business Standards supporting the Code](#).
- The business keeps an audit trail of signed acceptance from all employees (new and existing) each year.
- All our employees are fully aware that they are required to sign their acceptance to the Code by the 31 of December every year, and that failure to sign their acceptance to the code will result in the automatic withholding of any annual bonus they would otherwise have been awarded and may lead to further disciplinary action.

## **2) How do we raise a concern?**

It is important that we live by our values so that we help to protect Aviva, our customers and each other.

- Through caring more, we will actively seek out and address what is wrong and we will not let fear stand in the way of what is right.
- By never resting, we will always strive to make and do things better.
- By making the right decisions now, we will create a legacy we can all be proud of in years to come.

If we have a legitimate concern about improper behaviour or suspected wrong doing within Aviva, we act immediately considering the following:

### **What to report**

We report any concerns of improper behaviour within Aviva such as:

- failure to comply with a legal obligation (including commission of a criminal offence)
- miscarriages of justice
- dangers to health and safety or the environment
- fraud or accounting misstatement
- facilitation of tax evasion
- bribery
- market abuse
- human rights abuses (including slavery and forced labour in our business or supply chain)
- bullying and harassment
- breach of Aviva's policies and procedures
- behaviour that harms or is likely to harm the reputation or financial well-being of Aviva, or
- the cover-up of any of the above whether or not the information is confidential.

Some examples are included in our Speak Up leaflets and employee/manager guides. You can download these from the [Speak Up site on Aviva World](#).

### **When to report**

We report a concern as soon as there is a reasonable and genuine suspicion. We do not try to investigate the matter ourselves or try to prove that our concern is well-founded. Providing our concern is reasonable and genuinely held it doesn't matter if it ultimately turns out to be wrong.

### **How to report**

We encourage each other to raise all concerns openly and with our line manager. If we are uncomfortable with this (for example, where the concern is about our line manager) or if we have already raised this with our line manager but no appropriate action has been taken, we can contact Speak Up- a completely independent malpractice reporting service that allows us to report our concerns confidentially.

Speak Up has a free 24-hour service which operates seven days a week offering the facility to report in our local language.

We can contact Speak Up by:

Email: avivaspeakup@expolink.co.uk  
Website: <http://www.expolink.co.uk/avivaspeakup>  
Telephone:  
Canada 1855 223 2807  
France 0800 918 479  
Hong Kong 800 908 589  
Ireland (Eire) 1800 806 186  
Italy 800 797 552  
Singapore 800 4411 140  
Spain 900 974 481  
UK 0800 915 4043  
Vietnam 120 11527

### **How Aviva protects its employees**

We cannot let fear stand in the way of what is right. If we genuinely believe that improper behaviour has occurred and report these concerns, we will be protected from any unfavourable treatment.

If we believe we have been unfavourably impacted, we can contact [Group Investigations](#) or the Chief Audit Officer, who will commission an independent review.

### **If we raise a concern we know to be false**

It doesn't matter if we are mistaken; the important thing is that we act on a genuine concern. However, this assurance is not extended to anyone who raises a concern they know is untrue with malicious intent. Any employee who is found to have done so is likely to face disciplinary action.

### **Reporting Externally**

In the UK, both the Financial Conduct Authority and the Prudential Regulation Authority support the use of whistleblowing procedures. We can report to the regulators at any time. We do not have to report to Aviva or Speak Up before doing so and we can also report through both channels simultaneously. Information on the Regulators' reporting processes can be found by visiting their websites:

FCA: <https://www.the-fca.org.uk/whistleblowing>

PRA:

<http://www.bankofengland.co.uk/pru/Pages/contactpra/whistleblowing.aspx>

*Further information on the process can be found in the [Speak up Charter and Group Investigations](#) pages on Aviva World.*

## Aviva's business ethics principles explained

### 1. Act with integrity

#### What is expected from us?

We are expected to uphold the highest standards of corporate ethics, integrity and honesty. We are expected to conduct our personal and business dealings in accordance with all laws and regulations applicable to the market in which we operate, and in accordance with the Aviva's Group standards and values. We are expected to comply with both the spirit and the letter of all laws and regulations in order to maintain the highest standards of business integrity.

#### Why is this important?

It is fundamental to the integrity of Aviva's businesses and its employees, and to the reputation of the Group, that we operate with integrity and within the spirit and letter of all applicable laws and regulations.

#### Scenario

Q: In the country in which I work the law does not require the level of compliance that the Group standards require – how do I deal with that?

A: The Group standards are the minimum standards which apply to all Aviva businesses and employees. If there is a difference between Group policies / standards and local laws and regulations employees are expected to follow the highest standards in all cases.

### 2. Reject Financial Crime

Aviva will always seek to comply with financial crime legislation and regulation and work proactively to help protect our customers, shareholders and employees from financial crime. We expect, employees, business partners, suppliers, agents and other associated third parties to follow our lead. Aviva Group has no appetite for intentional or repeated breaches of law, regulation or policy related to financial crime.

#### What is expected from us?

There are six key areas of financial crime which we need to be aware of:

- Bribery and corruption
- Fraud
- Facilitation of tax evasion
- Market abuse
- Money laundering and terrorist financing
- Sanctions

#### Why is this important?

Financial crime can be detrimental to our customers and shareholders, undermine market integrity and investor confidence or even support terrorism. We risk compromising Aviva's reputation and exposing the company and its employees to the risk of substantial fines and even imprisonment. Aviva will

investigate and seek to prosecute agents, employees, directors or others suspected of engaging in acts of financial crime within Aviva.

### **a) Bribery and corruption**

Bribery involves the offer, promise, payment, transfer, request, or receipt of anything of value, to induce someone to perform their role improperly.

Offering or accepting a bribe is a criminal offence. Paying or offering a bribe while acting on behalf of Aviva can also expose the company to criminal action.

We operate under the UK Bribery Act 2010. The Act has extensive powers and broad jurisdictional reach that makes it applicable across all of Aviva. Under this law, employees and directors of the Group may be prosecuted if a bribe is paid in any part of the world to induce improper behaviour for the benefit of Aviva.

#### What is expected from us?

We reject the offer or payment of a bribe in any part of our business activity, anywhere in the world.

We refuse to pay or offer a bribe, no matter how small, anywhere in the world.

We complete relevant training to be able to identify and manage the bribery risks that may arise in our roles.

We report all offers of a bribe, requests for a bribe or suspected corruption immediately to the local Financial Crime or Compliance team.

Scenario:

Q: You are due to sign an agreement with a local government office to provide insurance cover. The public officer that you are dealing with suggests that another insurer has offered him a weekend break to advance their tender and asks if you can do the same. What should you do?

A: You must politely refuse this suggestion and report the incident to your local Financial Crime or Compliance team.

### **b) Fraud**

Fraud can occur in many ways. At its core fraud consists of acts of deception designed to secure unfair or unlawful financial or other benefit. Aviva may be the victim of fraud from internal sources (e.g. employee expense fraud or theft of Aviva's data), and from external sources (e.g. underwriting or claims fraud). We also have a role to play in protecting our customers from fraud involving Aviva products, for example where they may fall victim to a 'scam' that targets their pension or investment funds.

#### What is expected from us?

All of us have a responsibility to play an active part in anti-fraud activity and to be vigilant. We need to act with honesty and integrity ourselves and help protect Aviva's assets. Where we have a suspicion of fraud, we report it immediately, in line with local escalation process to our manager or through Speak Up if appropriate.

### **c) Facilitation of tax evasion**

Tax evasion is the illegal non-payment or under-payment by a tax payer of taxes due to the relevant authorities. As individuals, it is also illegal for us to help anyone evade tax. Aviva can be held criminally liable if we allow employees, or any other person associated with the company, to deliberately and dishonestly assist someone to evade tax. This could be a customer, supplier, business partner or other external party that has criminally evaded tax – we need to be able to show that we have not ‘facilitated’ that evasion.

#### What is expected from us?

We strictly prohibit any person associated with Aviva from doing anything that supports, encourages or facilitates tax evasion. We act with honesty and integrity, and report any suspicion of tax evasion to our local Financial Crime or Compliance team, our line manager or through Speak Up.

### **d) Market abuse**

Market abuse includes engaging in insider dealing; recommending or inducing another person to engage in insider dealing; actual or attempted market manipulation and unlawful disclosure of inside information.

#### What is expected from us?

Directors, employees, advisers and agents must comply with our internal controls designed to mitigate and manage the risks of market abuse.

Directors, employees, advisers and agents:

- Must act with integrity regarding information obtained and held on behalf of the Group and be on guard to avoid careless or inadvertent disclosures which may damage the Group’s business or that of its customers or suppliers.
- Should not deal in shares of Aviva whilst prohibited to do so under the [Aviva Share Dealing Policy](#).
- Should not disclose unpublished inside information to any other person except where it is necessary to do so to carry out their duties and is appropriately approved and recorded.
- Should not deal in securities of any other company whilst in possession of 'inside information' in connection with that company.

Directors and certain employees are prohibited from dealing in Aviva’s shares during so called “closed periods” and must seek clearance before dealing at other times. The share dealings of Directors and some senior executives must be announced externally and reported to the FCA.

### **e) Money laundering and terrorist financing**

Money laundering is the process by which individuals attempt to hide, disguise, move or use the proceeds of crime, such as narcotics trafficking, fraud or corruption. Terrorist financing is the use of funds, assets or services to fund or support terrorist activities. Terrorism may be funded through the proceeds of criminal activity (e.g. kidnapping) or through legitimately derived funds.

#### What is expected from us?

We take care to avoid engaging in or facilitating money laundering and terrorist financing by, at, or through Aviva. We complete anti-money laundering training, are aware of the money laundering risks in our business; complete due diligence on our customers, monitor their activities and keep their information up to date. We report suspicions of money laundering to the local Financial Crime or Compliance team.

#### **f) Sanctions**

Governments and multinational organisations, including the United Nations, EU and UK impose trade and economic sanctions to pursue foreign policy or national security interests. Sanctions targets may include individuals, entities, governments or government agencies. Impacted business relationships may include clients, business partners, distributors, claims handlers or others. Generally, any business with sanctions targets is prohibited. Breaching sanctions is a crime for the individuals involved and for Aviva and its employees.

#### What is expected from us?

We complete due diligence on our customers, business partners, suppliers, and others to ensure that we are legally able to deal with them and escalate any concerns of potential sanctions breaches to the local Financial Crime or Compliance team.

We complete sanctions training required for our role, comply with applicable sanctions laws and regulations, and adhere to Aviva's control requirements.

[Please refer to the Financial Crime, and Legal and Secretarial Business Standards for further information regarding the areas set out above.](#)

### **3. Conduct business in a fair manner:**

#### **a) Gifts and Hospitality**

#### What is expected from us?

We take care not to be compromised by gifts and entertainment when doing business with suppliers, business introducers or other third parties. This applies to gifts, entertainment and hospitality given and received.

Business entertaining can form part of a normal business relationship. However, it should always be proportionate, appropriate and transparent. All Aviva employees are required to record entertainment, hospitality and gifts given and received in a local 'Gifts and Hospitality Register'.

The provision, offer or receipt of entertainment worth £100 or over (or equivalent in local currency) or gifts worth £25 or over (or equivalent in local currency) must be recorded in the local register even if they were not accepted.

#### Why is this important?

Accepting gifts and hospitality could be seen as a bribe if the gift is lavish, disproportionate, or intended to influence the recipient.

Offering or accepting gifts and hospitality in contravention of Aviva guidelines is a serious disciplinary offence for Aviva employees.

Scenario:

Q: A supplier contract is due for renewal. Your main contractor invites you to the races for a day, with all travel, food and drink included. Should you accept this hospitality?

A: As the contract is due for renewal, no form of entertainment is acceptable to or from the supplier. Even though the hospitality must be declined, if it has a value over £100 (or local equivalent) the offer of hospitality must be entered onto the hospitality register.

### **b) Supplier relationships and third-party partnerships**

#### What is expected from us?

In addition to avoiding compromising offers of gifts and hospitality, we respect and comply with the terms of business partners' contracts. Aviva employees do not purchase goods and services from a prospective supplier if a condition of purchase is that the supplier buys products or services from the Group.

#### Why is this important?

We believe that fair and honest relationships make Aviva a trusted business partner. It is fair to ensure that we comply with the business terms of our partners, e.g. paying for services provided within the agreed timeframe, complying with non-disclosure of information, and fully respecting the terms of licence of copyrighted goods, e.g. computer software.

We inform all of our suppliers, brokers and other business introducers of our Code and our obligations as a trusted business partner, in particular the provisions of the UK Bribery Act 2010.

### **c) Conflicts of interest ("COI")**

#### What is expected from us?

We do not use our position at Aviva, our influence, or any company assets or resources in a way that will benefit us personally, or our family, friends, or the organisations they work with, or would lead to a conflict with the interests of Aviva or our customers.

#### Why is this important?

By managing and mitigating perceived, potential and actual conflicts of interest, we protect the reputation of Aviva and the relationships we have with others, including our customers and employees. Trust and integrity are an important part of maintaining our reputation as a fair business partner. By effectively managing and mitigating conflicts of interest we maintain our integrity and the trust that partners place in us.

[Further Information can be found in the Group Conflicts of Interest Policy.](#)

#### **4. Treat customers fairly**

##### What is expected from us?

We always act with integrity, considering what impact any decisions we take will have on Aviva's customers. All customers must be treated fairly and with respect; their needs must be the basis on which we design our products. Our communications must be clear, fair and not misleading (jargon-free) and clearly articulate any risks alongside benefits. When giving advice, we take reasonable care to ensure that advice is suitable for the customer's circumstances. We listen to feedback from customers and change our products, services and processes accordingly.

##### Why is this important?

Aviva is authorised and regulated by the Financial Conduct Authority (FCA), the UK regulator for the financial services industry. The principle of treating customers fairly is central to the delivery of the FCA's retail regulatory agenda, which aims to ensure an efficient and effective market for consumers. Aviva must be able to satisfy its internal governance leadership and the FCA that, across the Group, we are operating in accordance with the FCA principles for businesses – and importantly, that we have a culture of delivering fair outcomes for customers.

Scenario:

Q: A customer contacts you to complain about an aspect of our service. What should you do?

A: You should treat the customer with respect by listening to their complaint. Record the details and pass to the relevant team ensuring that they have received the complaint.

#### **5. Respect confidentiality of information and uphold competition laws**

##### What is expected from us?

We ensure that neither us nor Aviva are in possession of, or make use of, confidential information or material improperly obtained from any third party, including for example confidential material belonging to your previous employers.

We do not discuss, share or receive confidential or commercially sensitive information with competitors. Commercially sensitive information includes any information which is not in the public domain including details of price, premiums, commission, costs, margins and distribution strategies.

We treat all information obtained concerning Aviva – its businesses, practices, operations and employees – as strictly confidential and ensure that we only use it for legitimately carrying out our duties and using only approved Aviva IT equipment (e.g. you should not send Aviva data to your personal email address for any reason).

During and after employment with Aviva, we never use confidential information for our own purposes, or publish or disclose it to any third party, without specific authorisation. We never use confidential information to the detriment or prejudice of Aviva, its partners or employees.

#### Why is this important?

All employees must act with integrity in relation to information obtained about Aviva during their employment. The exchange of commercially sensitive information, at formal or informal discussions, that could be used to influence Aviva's or other's pricing strategy or pricing decisions could be a breach of competition law.

Scenario:

Q: A competitor organisation has asked you to forward all names and job titles of your team, as they say that they are looking to set up a similar team. Would you forward them on?

A: Unless proper authority is given, no employee should access, modify, disclose or make use of any confidential Aviva or personal information other than for legitimately carrying out his or her duties.

## **6. Data privacy**

### What is expected from us?

We respect and protect the privacy of our employees, customers, and other stakeholders. To ensure we deliver on this commitment, we:

1. Only use personal information for the process or purpose that has been agreed by our business area.
2. Will not collect or use any extra personal information other than that which we need for the product or process that we are delivering.
3. Keep personal information up to date.
4. Only hold personal information for as long as we need it, in accordance with our Business Unit Retention requirements.
5. Make sure that personal information is kept secure in accordance with CISO Standards and Guidance.
6. Respect individual privacy rights.

### Why is this important?

Our customers, employees and other stakeholders trust us to process their data responsibly and keep it secure. Failure to do so could destroy the trust our customers placed on us, subject Aviva to large financial fines, or prevent us from processing some or all personal data needed to deliver products to our customers

[Further information can be found in the Aviva Global Privacy Standard or from your Business Unit Data Privacy Team](#)

## **7. Report accurately and honestly**

### What is expected from us?

We record all financial transactions in an accurate and timely manner according to generally accepted accounting principles and relevant laws and regulations.

We ensure that all payments and transactions are supported by appropriate documentation which clearly identifies and describes their nature and purpose.

We ensure that all funds and balances are accurately reflected in the books and records of the relevant companies. Accounting practices that suppress records, misstate results, obscure the nature of transactions or otherwise alter the substance of any transaction are strictly prohibited.

[Further information can be found in the Group Financial Reporting Business Standard.](#)

## **8. Deliver on our responsibilities towards our people, community and the environment**

### What is expected from us?

#### People

We treat our people with respect. We do not tolerate any form of abuse or harassment of employees, contractors, suppliers, customers or anyone else we deal with.

We ensure that access to employment, development opportunities and promotions are:

- Free from discrimination on the grounds of gender, gender reassignment, sexual orientation, pregnancy and maternity, marital status, creed, colour, race, religion, age, ethnic origin, nationality, union status or disability (which can include both physical and mental conditions).
- Based on the objective assessment of ability, relevant job-related criteria, and any relevant legislation.
- In the case of training and career development, based on agreed need.

#### Health and Safety

Aviva must provide a secure, safe and healthy environment for all employees, as well as managing risks to contractors, customers and members of the public on Aviva premises.

We are encouraged to participate actively in achieving high standards of health and safety and are reminded that they must co-operate with management so we are compliant with our statutory duties.

#### Community

Aviva is committed to help address the challenges that people and society face. We do this by acting responsibly in our communities, extending our positive impact through insight, expertise and partnership. We channel financial and organisational support into our local communities. We share our time and skills by volunteering for the causes that matter to us.

### Charitable donations

Any charitable initiative should contribute to the delivery of our Corporate Responsibility strategy. We do not authorise charitable partnerships or donations that meet any of the following criteria:

- With or for individuals. Any donations must always be paid directly into a charitable organisation's account
- With or for political organisations
- For projects that favour the propagation of a religious belief or where participants/beneficiaries are required to belong to a particular religion
- For extreme, 'high risk' sports.

Due diligence\* is carried out on all charities before a donation or a partnership is agreed. This is to assess the viability of the charity and also as part of our risk management approach.

Donations at the request of a public official are prohibited. There is a high risk that this type of donations would be considered as a bribe or a facilitation payment under the UK Bribery Act 2010.

### Environment

We are aware of and adhere to local environmental regulations.

Aviva seeks to demonstrate leadership in our effort to reduce our adverse impact on the environment, both in terms of our operations and through our role as an investor, purchaser (both for Aviva and on behalf of our customers) and employer. To this end, we all have a responsibility to reduce our use of natural resources (paper, water) and energy use, including business travel and minimise and recycle waste where possible.

### Why is our approach to people, health and safety, community, donations and the environment important?

Aviva aims to attract and retain the best talent available as the foundation for being a talented and sustainable workforce. We have a duty to uphold our corporate reputation and our commitments to corporate responsibility are a key part of protecting our reputation.

Aviva has publicly stated commitments to reduce our environmental impact, to work with our suppliers to manage our impacts, to be transparent in our reporting and communications.

[Further information can be found in the Corporate Responsibility, Climate Change and Environment, People, and Health and Safety Business Standards.](#)

*\*There is a due diligence template that must be used for charitable partnerships and donations. This template is available from your local Corporate Responsibility team.*

## **9. Refrain from making political donations**

### What is expected from us?

We do not make any political donation or incur any political expenditure on behalf of Aviva unless explicit permission has been sought and approval granted in advance by the Group Company Secretary.

### Why is this important?

It is Aviva Group policy not to make political donations. Donations are illegal in some jurisdictions and other jurisdictions have strict requirements to ensure that corporate approval has been sought and that donations are disclosed. Under the UK Bribery Act 2010 some payments (in the UK or elsewhere) to political candidates or individuals holding elected legislative office may be considered as bribes.

*[Further information can be found in the Group Legal and Secretarial Political Donations guidelines.](#)*

## Appendix 1

### Group Business Standards

We read the following Group Business Standards in conjunction with the Business Ethics Code:

- Corporate Responsibility, Climate Change and Environment
- Financial Crime
- Financial Reporting
- Health and Safety
- People
- Customer Experience
- Procurement and Outsourcing
- Internal Controls
- Legal and Company Secretarial
- Aviva Investors Code of Ethical Conduct
- Global Data Privacy Standard.

We read and understand all Business Standards and Policies applicable to our roles. All Aviva Business Standards and Policies can be found on [Aviva intranet](#) or local intranet.

Where appropriate to our role, we are encouraged to familiarise ourselves with the [Speak Up Charter](#), and the Aviva Share Dealing Policy.

In some instances, business units may have additional local policies or guidelines for conducting business in their country. It is the responsibility of management to ensure all employees are made aware of such policies.