



**AVIVA**

**Business Ethics Code  
September 2017**

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This 2017 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 as a consequence 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  
August 2017

## **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 [Right Call](#), 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 Right Call 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 Right Call leaflets. You can download a leaflet from the [Right Call 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 Right Call- a completely independent malpractice reporting service that allows us to report our concerns confidentially and without fear of reprisal.

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

We can contact Right Call by:

Email: [rightcall@expolink.co.uk](mailto:rightcall@expolink.co.uk)

Website: <http://www.expolink.co.uk/rightcall>

Telephone:

Canada 1855 223 2807

France 0800 918 479

Hong Kong 800 908 589

Ireland (Eire) 1800 806 186

Italy 800 797 552

Spain 900 974 481

UK 0800 915 4043

### **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 and Forensic Audit \(GIFA\)](#) 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 Right Call 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 [Whistleblowing Charter on the Right Call](#) and [Group Investigations and Forensic Audit \(GIFA\)](#) 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 maintains a zero tolerance approach towards acts of financial crime being undertaken by, at or through Aviva, its businesses, employees, or business relationships with clients, business partners, suppliers, agents or other associated third parties.

#### What is expected from us?

We comply with all applicable financial crime laws and regulations. There are six key areas of financial crime of which Aviva requires us to be aware of and avoid any actions which would violate these laws or create the appearance of impropriety:

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

There are also areas where we must report certain activity to help Aviva to manage its financial crime risk. As set out more fully below, these areas include: gifts and hospitality, conflicts of interest, political and charitable contributions.

#### Why is this important?

Among Aviva's most important assets is its reputation for integrity and fair dealing. No transaction or client is worth compromising Aviva's reputation and/or exposing Aviva and its directors, employees and/or agents to the risk of criminal or civil penalties including substantial fines, disgorgement of profits or imprisonment. Financial crime activities may be detrimental to our customers and shareholders, undermine market integrity and investors confidence (e.g. market abuse, which undermines the principle that all investors must be placed on equal footing), or even support terrorism.

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

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

Bribery and corruption involves the offer, promise, payment, transfer, request, agreement to receive or receipt of anything of value, whether directly or indirectly, to or from any person, in order to induce that person to perform his or her role improperly.

Offering or accepting a bribe is a criminal offence not only for the individual, but if they are acting on behalf of Aviva, the company may be found to have committed an offence. The UK Bribery Act 2010 has extensive powers and broad jurisdictional reach. The Act applies to both the public and private sectors and affects anyone who acts on behalf 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 a government official or another company or supplier or other third party to induce improper behaviour for the benefit of Aviva.

#### What is expected from us?

We reject bribes in any part of our business activity anywhere in the world, including to government officials or anyone with decision-making powers including whether to award business to Aviva or its agents. We refuse to give a bribe to any customer or supplier to gain a business advantage, including facilitation payments. We undertake annual training to be able to identify risks. We report all cases of suspected bribery to Group Investigations and Forensic Audit immediately.

#### Scenario:

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

A: You must refuse this suggestion and report the incident to your manager. You must also log the incident as directed in your anti-bribery training.

### **b) Fraud**

Fraud may occur in many ways. At its core fraud consists of acts of deception designed to secure unfair or unlawful gain, whether financial or otherwise, or to damage another individual. Aviva is exposed to both internal (e.g. expense fraud or theft of Aviva's data), and external fraud (e.g. underwriting or claims fraud).

#### What is expected from us?

All of us have a responsibility to play an active part in anti-fraud activity and to be vigilant on this front. Where we have a suspicion of fraud we report it immediately, in line with local escalation process to our manager or through Right Call as preferred.

### **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. Aviva can be held criminally liable if its employees, or any other person associated with it, deliberately and dishonestly facilitates tax evasion.

#### What is expected from us?

Aviva strictly prohibits any person associated to it from doing anything that supports, encourages or facilitates tax evasion. We must all act with honesty and integrity, and report any suspicion of tax evasion in line with the local escalation process (e.g. your local Financial Crime or Compliance team, your line manager or through Right Call).

### **d) Market abuse**

Market abuse may arise in circumstances where financial investors have been unreasonably disadvantaged, directly or indirectly, by others. Generally market abuse includes engaging or attempting to engage in insider dealing; recommending or inducing another person to engage or attempt to engage in insider dealing; actual or attempted market manipulation and unlawfully disclosing inside information.

#### What is expected from us?

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

Directors, employees, advisers and agents:

- Must act with integrity in regard to 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 absolutely necessary to do so to carry out their duties.

If it is absolutely necessary to disclose this information, that person must first be advised and agree that the information is confidential and that he or she will become subject to the same dealing and disclosure restrictions before disclosing the information. It is the employee's responsibility to ensure the Group Secretarial Department is immediately informed of their access to inside information so that the relevant insider lists required by the FCA are updated.

- 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**

Money laundering is the process by which individual and/or the entities through which they operate attempt to hide or disguise the true origin and ownership of the proceeds of criminal activity, including funds derived from narcotics trafficking, fraud or corruption. Terrorism may be funded through the proceeds of criminal activity or through legitimately derived funds.

##### What is expected from us?

We take care to avoid engaging in or facilitating money laundering by, at, or through Aviva. We complete anti-money laundering training, and are aware of money laundering risks in our business and report concerns/suspicions of money laundering as required by our business unit and applicable local laws.

#### **f) Sanctions**

Governments and multinational organisations, including the United Nations, impose trade and/or 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, business with sanctions targets is strictly prohibited. Violations of these laws may be criminal in certain jurisdictions including the UK.

##### What is expected from us?

Potential exposure to sanctions varies depending on an employee's role. We complete sanctions training required for our role, comply with applicable sanctions laws and regulations and Aviva's systems and controls implemented to ensure compliance with the same.

[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 party agents.

Business entertaining can form part of a normal business relationship, however there is a limit to the cost of this entertaining. All Aviva employees are required to keep a hospitality register for entertainments and gifts received.

Entertainment worth £100 or over (or equivalent in local currency) and gifts worth £25 or over (or equivalent in local currency) must be registered even if they were not accepted.

##### Why is this important?

Accepting gifts and hospitality will be treated as bribery under the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act (FCPA) if the gift is lavish or disproportionate to the situation. Accepting gifts and hospitality in contravention of these guidelines is a serious disciplinary offence for Aviva employees. It could also be a criminal offence under these laws.

##### 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**

#### What is expected from us?

We avoid any situations which could lead to an actual or perceived conflict of interests with the interests of Aviva or our customers. 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 or 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 avoiding conflicts of interest we protect the reputation of Aviva and the relationships we have with others. Trust and integrity are an important part of maintaining our reputation as a fair business partner. By avoiding conflicts of interest we maintain our integrity and the trust that partners place in us.

[Further Information can be found in the Group Procurement and Outsourcing Business Standard, the Group Distribution Management Business Standard and the Financial Crime Business Standard.](#)

### **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 in the course of 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.

Privacy and data protection laws demand high standards of practice when handling personal information. We always:

- Obtain, process and use personal information fairly and lawfully.
- Only disclose personal information to those who are authorised to receive it.
- Hold personal information that is accurate, relevant and up-to-date.
- Keep personal information secure.
- Not hold excessive information or keep it longer than is necessary.
- Process information in accordance with the rights of the individual.

### Why is this important?

Personal data entrusted to us by our customers and employees is essential for our businesses. If we fail to comply with the Data Protection principles, we will lose the trust of our customers, may be prohibited from processing some or all personal data, and could be subject to large financial fines.

[Further information can be found in the Global Data Protection and Privacy Specification which is associated to the Business Protection Standard.](#)

## **6. 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.](#)

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

### What is expected from us?

#### People

As a business we must 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

As a responsible business, 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.

Our global community development strategy guides our approach. We channel financial and organisational support into our local communities. We care about our 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 real 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.*

## **8. 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.

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 Whistleblowing 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.