

Aviva's commitment to the prevention of bribery and corruption

Preventing and tackling bribery and corruption is anchored in Aviva's values with a clear message from senior management around a zero-tolerance approach to financial crime. The Group makes clear the importance of complying with certain processes, not just because it is written in a formal policy or procedure, but because it is the right thing to do and it is an integral part of our culture.

Prevention of financial crime

As an organisation committed to the prevention of financial crime, the Group establishes clear lines of internal accountability, responsibility and reporting. Primary responsibility for the prevention of financial crime rests with the business, which must ensure that appropriate internal controls are in place and operating effectively and that staff are adequately trained. The business is supported in meeting this responsibility by the Group Financial Crime team within the Risk function. In addition, a Group Financial Crime Risk Assessment is completed on an annual basis to analyse and determine the areas of the Group which present financial crime risk and to support the effective management of such risk.

Anti-Bribery and Corruption ('ABC')

The Group has a Financial Crime Business Standard which includes a Bribery and Corruption Risk Management Programme that is based on the UK Bribery Act. This Programme and its associated Minimum Compliance Standards set the baseline for ensuring compliance with the relevant legislation. The Business Standards and Minimum Compliance Standards are binding on all Group offices unless a specific modification or exception has been approved. Group offices must also ensure they are compliant with relevant local legislation to the extent its requirements are more stringent.

The Group strictly prohibits bribery in any form – including the use of 'facilitation payments'. The Group does not allow charitable donations, sponsorships and direct or indirect contributions to political parties or organisations to be used as a subterfuge for bribery.

The Group will not disadvantage any employee or anyone associated with the Group on account of their refusal to commit bribery. Any employee found to have breached the Business Standard will be subject to disciplinary proceedings which may include dismissal.

Key aspects of the ABC Risk Management Programme include:

- Oversight and governance;
- A risk assessment process;
- Communication and training;
- Due diligence on and risk rating of third party relationships;
- Confidential reporting, financial controls and record-keeping; and
- Independent assurance and testing

Employees

Employees are prohibited from offering, requesting or accepting bribes and other improper financial advantages. Employees may not provide anything of value to obtain or retain business or any advantage, financial or otherwise. “Anything of value” extends beyond cash to include improper gifts, hospitality, charitable and political contributions and employment or internships for clients, government officials or their relatives. This prohibition applies not only to government officials and employees or officials of organisations with government ownership or control, but also to clients, suppliers and any person with whom the Group does or anticipates doing business with. The Group expects all of its agents and suppliers to act at all times in compliance with applicable anti-bribery and corruption legislation.

Employment

Employment opportunities, whether permanent or temporary (including internships and work experience), must not be used as an inducement to anyone to act improperly so as to obtain or retain a business advantage. Employees must retain accurate records of all transactions or decisions relating to the Programme and must report any concerns they have regarding possible non-compliance. The Group maintains processes to enable staff to raise such concerns in confidence.

Third Parties

The Group prohibits bribery committed by third parties acting on its behalf. Appropriate due diligence must be carried out on all such third parties with suitable contractual terms and governance to reduce the bribery risk. The Group will consider whether to terminate its relationship with a third party who commits or is suspected to have committed bribery.

The Group is committed to maintaining a culture of the highest ethics and complying with our Business Ethics Code. We encourage anyone who has a genuine concern about misconduct to raise it through our Speak Up channel at avivaspeakup@expolink.co.uk or <http://www.expolink.co.uk/avivaspeakup>.