



Human Rights Policy

Aviva

October 2017

Retirement
Investments
Insurance
Health

Aviva Human Rights Policy

Aviva's commitment to respect human rights is guided by the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organisation's Core Labour Standards and its Tripartite Declaration of Principles, the UN Global Compact principles on Human Rights and Labour Standards, the Women's Empowerment Principles and the UN Guiding Principles on Business and Human Rights, which detail the "Protect, Respect and Remedy" framework.

Aviva has, and continues to nurture, an organisational culture that deeply respects dignity, human rights, and personal recognition. This culture, both within Aviva's operations and in our external business dealings, is implemented through our codes, business standards, contracts and internal HR policies and procedures. Aviva is a founding signatory to the UN Principles of Sustainable Insurance (PSI). We are also a founding signatory to the UN Principles of Responsible Investment (PRI) through Aviva Investors.

Policy Scope

The scope of this policy is group-wide and sets out the Group's commitment to respect human rights. It applies to all Aviva business units, operations, functions, and staff, including but not limited to legal entities (including joint ventures (JV)), acquisitions, disposals, outsourcing arrangements, new products, new asset classes and strategic projects. These may be referred to generally as "the business" or "businesses". Where a business enters into internal or external outsourcing arrangements, it may delegate operations but cannot delegate responsibility or accountability for human rights and must ensure appropriate contracts, monitoring frameworks and reporting procedures are in place.

Where Aviva has entered into joint venture arrangements the management team responsible for oversight of the joint venture must use all reasonable endeavours to implement this policy into the joint venture arrangements.

Customers

We respect the rights of our customers by treating them fairly, listening to them and by integrating their feedback and human rights considerations into our business processes, and the products and services which meet their needs.

Our customer's right to privacy is of particular relevance as we manage large amounts of data as part of providing our products and services. We have policies, processes, and controls in place to ensure that customer data is managed in an ethical, lawful and responsible way.

Employees

We promote fair reward, diversity and inclusion, equal opportunities, the freedom of association and other human rights through our interactions with our employees, and in our decisions on hiring, remuneration, training and promotion. Our People Standard prohibits any form of discrimination based on gender, sexual orientation, gender identity, marital status, family status, creed, colour, race, religion, age, ethnic origin, nationality, union status or disability.

We value the views of our employees and promote a collaborative, open and transparent communications environment which helps us maintain a healthy and strong workplace. We provide a secure, safe and healthy environment for all staff. To this end, each office or workplace implements its own health and safety policy with suitable incident/accident management procedures and systems. Our employees have training on ethical behaviour and are required to behave in accordance with our Business Ethics Code. Failure to comply with the Business Ethics Code may result in dismissal or other disciplinary action.



Suppliers

We promote respect for human rights throughout our value chain. We use a due diligence process to evaluate and select suppliers and ask them to disclose their human rights policies as part of our selection criteria. Suppliers are asked to sign up to our Supplier Code of Behaviour, which covers the environment and ethical business conduct, as well as human rights, including the prevention of modern slavery and the protection of children's rights. A clause in our standard procurement contracts requires our suppliers to commit to the provisions of the ILO's core standards, and uphold the Universal Declaration of Human Rights.

We ensure that suppliers pay at least the Living Wage to employees that are subcontracted to Aviva. Compliance with our standards is monitored once any contract has been signed. We engage with suppliers to understand and address concerns around human rights issues that may arise during the period of the contract and keep a record of these engagements.

Investment

We are committed to investing our money and our customer's money in a responsible manner. Our asset management firm, Aviva Investors, is a founding signatory to the UNPRI and we are committed to integrating environmental, social and governance issues into our investment analysis and decisions across all asset classes. Aviva Investors actively engages with companies on human rights issues as part of the way we evaluate how a company manages its employees, broader community impacts and reputational risk. We focus this engagement on the highest risk companies and where there have been allegations of serious breaches.

We fully support the Convention on Cluster Munitions, and have banned holding securities linked to companies involved in the manufacture of cluster munitions or anti-personnel mines in our shareholder and policyholder funds.

Due diligence

We conduct periodic human rights due diligence processes to ensure that we are not complicit in human rights abuses in the countries in which we operate in. We pay particular attention to the local context where there is a heightened risk of conflict and human rights abuses.

Governance

We have a set of policies, Business Standards and internal procedures that support delivery of our commitment to Human Rights and the prevention of modern slavery in our operations and supply chains. These are listed in the annex. Our global risk management function monitors compliance with these Business Standards.

We recognise that senior-level participation is paramount. As such, our CEO, our Governance Committee and a cross-functional team of specialists in investment, procurement and outsourcing, risk and human resources are involved in our group-wide human rights due diligence and compliance processes.

Reporting

We are committed to ensuring that we adequately report human rights performance according to suitable benchmarks and frameworks for financial services and other matters, which we continue to refine.

We are committed to investigating and addressing concerns relating to human rights which are raised over and above our own due diligence and human rights risk assessments.

Grievance mechanisms

Human rights concerns or grievances raised by customers or external parties should in the first instance be communicated to the Group Corporate Responsibility Directorate (CR.team@aviva.com) or to Right Call, our independent service for reporting malpractice anonymously (rightcall@expolink.co.uk). Employees, suppliers or similar should follow the complaint handling mechanism set by our Codes, Policies, Standards or contractual arrangements applicable to the area of concern. In case of doubt the Group Corporate Responsibility Directorate may be contacted.

Our ongoing programmatic activities for human rights monitoring, training, and due diligence will be publicly disclosed on our corporate website.

A brief description of the most relevant policies, business standards and procedures are provided in Annex 1.

If you have any questions, please contact us at CR.team@aviva.com.

Mark Wilson

Aviva plc

Group Chief Executive Officer



Annex 1

The list below shows some of the most relevant policies, business standards, and other governance papers in relation to our Human Rights Policy.

Business standards

CR, Climate Change and Environment
People
Internal Control
Customer Experience
Procurement and Outsourcing
Health and Safety
Financial Crime
Communications and Public Policy
General Insurance Claims Handling
Life Insurance Claims handling
Investment Management
Life Insurance Underwriting
GI Underwriting
Data Governance

Other, codes, policies, statements

Business Ethics Code
Cluster Munitions Policy
UK Corporate Governance and Corporate Responsibility Voting Policy
Aviva Investors Stewardship Statement
Modern Slavery Act Statement

HR procedures at market level cover among other areas the following:

Grievance procedures
Harassment
Managing age in the workplace
Managing disability in the workplace
Managing gender in the workplace
Managing race in the workplace
Managing religion in the workplace
Managing sexual orientation in the workplace
Managing pregnancy & maternity in the workplace
Managing marriage & civil partnership in the workplace