



# The Aviva Human Rights Policy

February 2021



# Introduction

We recognise that businesses have a responsibility to respect internationally recognised human rights. The human rights in question address social, workforce, economic, cultural, civil and political concerns. Aviva is fully committed *to respecting* human rights in accordance with the United Nations (UN) Universal Declaration of Human Rights<sup>1</sup>, the International Labour Organisation’s (ILO) Core Labour Standards and its Tripartite Declaration of Principles<sup>2</sup>, the UN Global Compact principles on Human Rights and Labour Standards<sup>3</sup>, the Women’s Empowerment Principles<sup>4</sup> and the UN Guiding Principles on Business and Human Rights, which detail the “Protect, Respect and Remedy” (PRR) framework<sup>5</sup>. We also uphold the values behind the Children’s rights and Business Principles<sup>6</sup>.

Our Purpose at Aviva is to “be with you today for a better tomorrow” and our Human Rights Policy is part of our commitment to act responsibly by respecting and avoiding infringing upon, the human rights of others.

As set out in our policies and business standards<sup>7</sup> we do not condone any unethical practices such as bullying and harassment and acts of prejudice and discrimination on grounds of race, gender, religion, sexuality and other characteristics. We forbid any form of trafficked, forced or child labour, including modern slavery in any form and are committed to keep creating a safe working environment which supports workers’ dignity and safety.

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7 See Appendix

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1 For more information please consult “The Universal Declaration of Human Rights” <https://www.un.org/en/universal-declaration-human-rights/>  
2 For more information please consult the “Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy” [https://www.ilo.org/wcmsp5/groups/public/---deep/---emp\\_ent/---multi/documents/publication/wcms\\_094386.pdf](https://www.ilo.org/wcmsp5/groups/public/---deep/---emp_ent/---multi/documents/publication/wcms_094386.pdf)  
3 For more information please consult “The Ten Principles | UN Global Compact” <https://www.unglobalcompact.org/what-is-gc/mission/principles>  
4 For more information please visit “The Women’s Empowerment Principles” <https://www.weeps.org/about>  
5 Divided into three pillars, the PRR Framework sets out the complementary roles of the private and public sectors regarding business and human rights: 1. States have a duty to protect, respect and promote human rights 2. Companies have a responsibility to respect human rights 3. Victims of business-related harm should have access to remedy. Companies, therefore, should consider and proactively assess the human rights impacts associated with their business actions, activities and relationships. Where relevant, they should address how they impact the lives of all their stakeholders, irrespective of the national laws under which they operate.  
6 The Children’s Rights and Business Principles, created by the UN Global Compact, UNICEF and Save The Children are the first encompassing set of principles that help companies on a wide range of responsibilities and actions that they can take in the workplace, marketplace and community to respect and support the rights of children. More information can be found at [https://www.unicef.org/corporate\\_partners/index\\_25078.html](https://www.unicef.org/corporate_partners/index_25078.html)

# Our policy scope

The scope of the Aviva Human Rights policy is Group-wide, and it sets out the Group's commitment to respect human rights and the expectations we set for our own people, no matter where they are based. It applies to all Aviva business units, operations, functions and staff, including but not limited to, legal entities and our joint ventures (JV), outsourcing arrangements, new products, investments including new asset classes and strategic projects. These are referred to generally as "the business" or "businesses".

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# Our employees

Our people<sup>8</sup> are at the heart of our business. We promote fair reward, diversity, 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.

Diversity and inclusion are key to Aviva being a responsible and successful business. Our People Standard prohibits any form of discrimination based on gender, sexual orientation, gender identity, marital status, family status, creed, colour, race, religion or belief, 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, inclusive and strong workplace<sup>9</sup>. We are signatories of the Race at Work Charter<sup>10</sup> and in 2020 we published a "Black Lives Matter" action plan to support our colleagues, educate our people and focus our wider impact in society<sup>11</sup>. Our progress toward creating diversity is monitored and disclosed on an ongoing basis.

Developing our people remains central to the work we do. We provide opportunities for apprentices and graduates, leadership development and all staff's training and coaching. We are committed to providing an environment which is safe and secure and supportive of our people's health and wellbeing. Each office or workplace implements its own health and safety policy<sup>12</sup> and has access to Aviva's wellbeing programme.

We continue to train our employees and raise awareness of human rights and modern slavery. We place importance on creating a culture that promotes high standards of ethical behaviour as well as human rights. All our employees are expected to meet the highest standards of ethical behaviour and to act in accordance with our Business Ethics Code, which they must attest to every year.

In the UK, we support the Living Wage Foundation and we have been a Living Wage employer in the UK since 2014. All eligible employees working in Aviva's buildings in the UK, including those contracted by our main facilities management suppliers, from catering to cleaning employees, are paid at least the Living Wage or the London Living Wage. In 2020, we became one of the first UK organisations to receive accreditation as a Living Hours employer<sup>13</sup> to combat insecure working contracts and unpredictable hours. We encourage a good work-life balance and offer flexible working arrangements where appropriate and we support our employees' rights to trade union membership and collective bargaining.

8 For more information on our people approach please visit "Our People" section on Aviva.com: <https://www.aviva.com/about-us/our-people/>

9 For our wider approach on Diversity and Inclusion please visit: <https://www.aviva.com/about-us/diversity-and-inclusion/>

10 For more information on our support to the Race at Work Charter please visit our "Diversity and Inclusion" section on Aviva.com: <https://www.aviva.com/about-us/diversity-and-inclusion/>

11 For more information on our support to the 'Black Lives Matter Movement' and our action plan please visit our "Black Lives Matter action plan" section on Aviva.com: <https://www.aviva.com/about-us/black-lives-matter-action-plan/>

12 Including the suitable incident/accident management procedures and systems

13 As a result, in addition to the real Living Wage, our eligible direct employees in the UK are: (1) provided with at least four weeks' notice of shifts; and (2) have a contract that accurately reflects hours worked, while offering a guaranteed minimum contract of 16 hours a week. For more information on Aviva becoming a Living hours employer please visit "Aviva becomes Living Hours employer" on Aviva.com: <https://www.aviva.com/newsroom/news-releases/2020/10/aviva-becomes-living-hours-employer/>

# Our customers

We always seek to respect the rights of our customers and to treat them fairly, acting with integrity and considering what impact any decisions we take will have on them. We consider the interests of all our customers, including but not limited to vulnerable customers who need attention and care. Our customers' needs are the basis on which we design our products and services. Our communications strive to be clear, fair and not misleading and to clearly articulate any risks alongside the benefits<sup>14</sup>.

When giving advice, we take care to ensure that advice is suitable for the customer's individual circumstances. We are committed to providing products that are accessible and we listen to feedback from customers (including regarding any human rights considerations) and we adapt our products, services and processes accordingly. These commitments are contained in our Business Ethics Code<sup>15</sup> for all employees. We have a vital duty to protect our customer's data and to be clear and transparent about the way this data is used. Our Customer Data Charter<sup>16</sup> outlines the way in which we keep personal data safe and secure and how we use it to improve our products and services. It also confirms that we do not sell personal data.

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14 To learn more on how we endeavour to do the right thing for our customers please consult "Doing the Right Thing for Our Customers" on Aviva.com: <https://www.aviva.com/social-purpose/customer/>

15 For more information please consult "The Aviva Business Ethics Code 2020" on Aviva.com: <https://www.aviva.co.uk/content/dam/aviva-public/gb/pdfs/personal/services-and-support/our-uk-business/products-and-services/business-ethics-code/the-aviva-business-ethics-code.pdf>

16 For more information on how we protect our customers data please consult our "Customer Data Charter" on Aviva.com: <https://www.aviva.co.uk/services/about-our-business/about-us/customer-data-charter/>

# Our suppliers

We operate in conjunction with a wide range of suppliers to deliver services to our customers, and we are committed to promoting respect for human rights throughout our value chain.

It is vital that we build strong working relationships with our suppliers around customer service and risk management. To this end we use a due diligence process to evaluate and select suppliers. Our suppliers are asked to agree to abide by our Aviva Third Party Business Code of Behaviour<sup>17</sup> which covers environmental impacts, ethical business conduct, respect for human rights, including the prevention of modern slavery, forced labour, the protection of children's rights, and the need to provide remediation if a violation is found. A clause in our standard procurement contracts requires our suppliers to commit to the provisions of the ILO's core labour standards and to uphold the Universal Declaration of Human Rights

We require that suppliers pay at least the Living Wage to eligible UK employees that are subcontracted to Aviva and working on its premises. Adherence to our standards is monitored, across the business, after a contract has been signed.

As stated in our Aviva Third Party Business Code of Behaviour, we will actively engage with suppliers to understand and address any concerns around human rights issues that may arise during the period of the contract and we keep a record of these engagements.

Where appropriate we may share training for our partners, for example anti-modern slavery training for higher risk small and medium-sized suppliers. We aim to continue to support supplier capability building where we can, especially in the areas related to human rights.

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17 See <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/aviva-third-party-business-code-of-behaviour.pdf>



We have a vital duty to protect our customer's data and to be clear and transparent about the way this data is used.

# Our investment

We are committed to investing our money and our customers' money in a responsible manner. Our asset management firm, Aviva Investors, is a founding signatory to the UNPRI (United Nations Principles for Responsible Investment) and we recognise and embrace our duty to act as responsible long-term stewards of our clients' assets. We maintain a deep conviction that environmental, social and governance (ESG) factors can have a material impact on investment returns and client outcomes. We believe that being a responsible financial actor means our investment approach must support, and not undermine, the long-term sustainability of capital markets, economies and society<sup>18</sup>.

As such, Aviva Investors is committed to integrating ESG issues, including human rights issues, into our investment analysis and decisions across all asset classes. Aviva Investors uses its influence as a large asset manager to engage with the companies it invests in on our behalf and on behalf of its other clients to drive positive change. Aviva Investors does this through research and active ownership, exclusions and by driving industry change.

In its research, Aviva Investors considers quantitative and qualitative information about human rights for companies, countries and real asset projects as part of the investment process.

Through *active ownership*, Aviva Investors engages with companies on human rights issues as part of the way it evaluates a company's management of its employees, supply chains, customers, broader community impacts and reputational risk. Aviva Investors focuses engagement on the highest risk companies and where there have been allegations of serious violations. Human rights are also embedded into Aviva Investors' voting policy<sup>19</sup>. The policy notes that as part of the process of evaluating and measuring a company's commitment to global standards on business practices, Aviva Investors will refer to the UN Global Compact Principles on Human Rights, Labour Standards, Environment and Business Malpractice. The approach specifically includes information from the Corporate Human Rights Benchmark (CHRB) which ranks companies in high risk sectors on their human rights performance. This benchmark is shared across the investment teams and embedded into the voting policy.

Generally, we believe it is more effective to use our influence and that of Aviva Investors to attempt to drive change, rather than divest. We will, however, exclude certain investments, as will Aviva Investors. We exclude investment in companies which derive prescribed levels of revenue from the manufacture of controversial weapons as set out in our exclusion policy for our shareholder and policyholder funds, as do Aviva Investors

in their exclusion policies<sup>20</sup>. This is because there is a wide, international consensus on the inappropriateness of these types of weapons<sup>21</sup>. We also recognise that some human rights issues are market failures and therefore need addressing through government and regulatory action. We engage with governments and regulators, particularly in our key markets, to call for and support policy action to tackle these challenges, such as through mandatory disclosure and mandatory human rights due diligence.



18 As set out in Aviva Investors ESG Philosophy: <https://www.avivainvestors.com/content/dam/aviva-investors/main/assets/about/responsible-investment/downloads/investment-philosophy.pdf>

19 As set out in "Aviva Investors Global Voting Policy". For more information please visit: <https://www.avivainvestors.com/content/dam/aviva-investors/main/assets/about/responsible-investment/our-approach-to-responsible-investment/downloads/uk-corporate-governance-and-corporate-responsibility-voting-policy-v2020.pdf>

20 Aviva Investors ESG Baseline Exclusion policy: <https://www.avivainvestors.com/content/dam/aviva-investors/main/assets/about/responsible-investment/downloads/esg-base-exclusion-policy-controversial-weapons.pdf>

21 As set out within key conventions and treaties including the Non-Proliferation of Nuclear Weapons Treaty, the Convention on Cluster Munitions (the Oslo Convention), and the Ottawa Treaty, which prohibits the use, stockpiling, production and transfer of anti-personnel mines

# Our human rights related due diligence

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

We recognise the importance of the provision of effective remedy when violations of human rights occur and continue to monitor and assess both our operations and supply chain, building awareness internally and working with our suppliers regarding respect for human rights<sup>22</sup>. We encourage employees and suppliers to report any human rights concerns, including via our speak-up helpline and are determined to continue our work towards effectively identifying and addressing any concerns.

As a leading Insurance company<sup>23</sup>, we extend our efforts to prevent and mitigate human rights violations in business relationships with customers, suppliers and third parties. We maintain group-wide procedures to conduct due diligence on the people we do business with including risk-based background screening designed to identify any known involvement in modern slavery, people trafficking or other human rights abuse.

We remain committed to continuously assessing and improving our business processes, training, communication and management systems and to continue integrate human rights considerations into our existing risk management processes across all our businesses.

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<sup>22</sup> For more information on our due diligence approach visit Human Rights and Our last published Modern Slavery statement <https://www.aviva.com/social-purpose/human-rights-and-our-modern-slavery-act-statement/>. Please note this page will be updated in 2021

<sup>23</sup> Aviva is also a founding signatory to the UN Principles of Sustainable Insurance (UNPSI), for more information please see <https://www.unepfi.org/psi/>



# Our governance

Together with *The Aviva Human Rights Policy 2020* (this policy), we have a set of policies, business standards<sup>24</sup> and internal procedures that support the delivery of our commitment to human rights and the prevention of modern slavery in our operations and supply chains. We also integrate human rights considerations into our existing policies and processes, including publicly reporting on progress in our annual report<sup>25</sup>.

Our global risk management function monitors compliance with our business standards<sup>26</sup>. We recognise that senior-level participation is paramount. As such, our CEO, our Customer Reputation and Governance Committee, and a cross-functional team of specialists in investment, procurement and outsourcing and risk and human resources are involved in our Group-wide human rights due diligence and compliance processes.

Our human rights work, including our efforts to tackle modern slavery in our operations and supply chain are sponsored by our Group General Counsel and Company Secretary and the Group Chief Operations Officer.

We are committed to ensuring that we adequately and transparently report our performance with respect to human rights in accordance with suitable benchmarks and frameworks for financial services 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 and we continue to measure and publish progress as part of our Aviva Plc annual report and accounts. We report on related human rights progress, including issues ranging from diversity and inclusion, to human rights and modern slavery training and awareness raising, to supplier assessments. As a key member, we make an annual UN Global Compact Communication on Progress. We also report on human rights, labour, diversity and related KPIs as part of other wider Corporate Responsibility reporting.

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<sup>24</sup> See appendix

<sup>25</sup> 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.

<sup>26</sup> See appendix



# Our Speak-Up helpline

We encourage a 'Speak Up' culture across Aviva and will not tolerate retaliation against anyone who speaks up or raises a concern. We provide multiple channels for our people and third parties to report concerns of suspected unethical or illegal behaviour, including breaches of our Business Ethics Code, including any human rights issues or violations related to our employees, our operations or our supply chains. Like everyone connected to Aviva, we encourage our suppliers and other third parties to do the right thing to protect our people, customers, assets, reputation. Therefore, any legitimate concern about improper behaviour in the workplace involving Aviva can be reported via the Aviva Speak Up facility.<sup>27</sup>

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<sup>27</sup> For more information on our "Speak-Up" helpline please check "The Aviva Business Ethics Code 2020" on Aviva.com: <https://www.aviva.co.uk/content/dam/aviva-public/gb/pdfs/personal/services-and-support/our-uk-business/products-and-services/business-ethics-code/the-aviva-business-ethics-code.pdf>

<sup>28</sup> Non-Governmental Organisations.

<sup>29</sup> Including legislation, soft laws and industry standards.

# Our partnerships

Where we can, we use our influence and networks to bring others together and improve the industry's wider understanding of, and impact on, human rights. We worked with the World Benchmarking Alliance (WBA) to host the launch of the third Corporate Human Rights Benchmark (CHRB) 2019 rankings, as funder and founding member. We continue to work with other partners including the Home Office Business Against Slavery Forum, the UN Global Compact UK Network. This allows us to interact, collaborate, and share best practice with international businesses experiencing the same challenges as Aviva, and to continue to leverage expertise on both human rights and modern slavery.

We are committed to continuously strengthen our approach to further embed our commitment to respecting human rights across our organisation. We will do this by working with third parties including but not limited to memberships, charitable organisations, industry peers, other like-minded organisations and NGOs<sup>28</sup>. By collaborating and learning from others and keeping up to date with evolving internal and external guidance<sup>29</sup> we can play our part in ensuring human rights are respected and celebrated in our business and wider communities.

This Human Rights Policy has been approved by Aviva Chief Executive Officer.

## Amanda Blanc

Aviva plc Group  
Chief Executive Officer

For queries about *The Aviva Human Rights Policy 2020*, please contact our CR team: [crteam@aviva.com](mailto:crteam@aviva.com)



# Appendix

## Our Internal Group policies and Business standards

The list below shows some of the most relevant policies, business standards, and other governance papers relating to The Aviva Human Rights Policy 2020.

- People, Internal Control Customer Experience Procurement and Outsourcing
- Health and Safety
- Diversity and Inclusion Policy

## HR procedures at market level covers, among other areas, the following:

- 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
- Harassment Procedure
- Resolution Procedure

## Our external codes, policies, business standards and statements available on Aviva.com

- [The Aviva Business Ethics Code 2020](#)
- [CR, Climate Change and Environment Business Standard](#)
- [UK Corporate Governance and Corporate Responsibility Voting Policy](#)
- [Aviva Investors Stewardship and Investment Policy](#)
- [Modern Slavery Act Statement](#)
- [Diversity and Inclusion approach](#)
- [Health and Safety Business Standard](#)
- [Customer Experience Business Standard](#)
- [Aviva Third party Business Code of Behaviour](#)
- [Aviva Investors Stewardship Statement](#)
- [Aviva Investors Voting Policy 2020](#)
- [Aviva Investors Responsible Investment philosophy](#)
- [Aviva Speak Up Expolink](#)



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