

# Corporate Responsibility (CR), Environment and Climate Change Business Standard

AVIVA

**Group standard owner**

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**Effective: 1 September 2015**

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# 1 Standard overview

## 1.1 Standard content and objectives

This business standard (the 'standard') sets out CR control and control objectives that businesses must comply with in order to ensure our vision of an Aviva that is trusted, respected and sustainable, making a real contribution to society.

The objective of this standard is to support a positive and consistent approach to CR at global level, helping us to responsibly manage our impact in the environment and make a real contribution to the communities where Aviva operates.

## 1.2 Target audience

This Standard is primarily of relevance for all employees.

## 1.3 Responsibility for implementation

It is the responsibility of business CEOs to ensure that their business operates in line with the control and control objectives set out in this Standard. This includes any internally or externally outsourced activities.

## 1.4 Expected business outcomes

The following expected business outcomes provide a high-level summary of the intention of the business standard.

Expected business outcomes	
1.	There is a positive and consistent approach to CR at global level, measured on a regular basis.
2.	Businesses limit the impact they have on the environment and respect human rights in their operations.
3.	Businesses make a real contribution to the communities where Aviva operates, acting with integrity, and respecting Aviva's aims and values when entering into charitable partnership arrangements.
4.	Businesses keep relevant stakeholders engaged.

## 1.5 Associated risks from the operational risk register

The following are the risks from the Common Operational Risk Register that align to this standard. Controls implemented should mitigate these risks so the residual risk is inside tolerance.

CORR Ref	Risk title	Risk description
CPB11	Sanctions	Risk associated with non-compliance with international sanctions laws and regulations
CPB14	Bribery and corruption	Risk associated with non-compliance with applicable anti-bribery and corruption (ABC) laws and regulations

CPB47	Local regulation and legislation	Risk associated with not complying with local regulations and legislation
ELR01	Living Aviva's Values	Risk associated with the organisation operating without due regard to Aviva's values, or acting without integrity and ethics
ELR11	Corporate Social Responsibility	Risk associated with not being a socially responsible organisation
EMMR39	Prudential reporting	Risk associated with prudential reporting
EPSE01	Employee and public health and safety	Risk associated with protecting employees and the public in line with Health and Safety legislation or equivalent safe working directives

## 2 Standard Contents

### 2.1 Mandatory Controls and Control objectives

Each **orange box** contains an Aviva Global Control Objective. This articulates the desired outcome of the controls (either Aviva Global Controls.

Text in the **blue boxes** indicates to which risk, from the common operational risk register (CORR), the control objectives and controls are associated.

CRE-O-01	Business must ensure that they respect human rights, as defined by the Universal Declaration of Human Rights, and are aware of and uphold the UN Guiding Principles on Business and Human Rights.	ELR01
If you require further guidance on the requirements from the UN Guiding Principles on Business and Human Rights you can arrange a briefing on this subject by contacting Group CR.		
CRE-O-02	Businesses must maintain an adequate CR governance structure.	ELR01
CRE-C-01	Business must maintain a governance structure that provides oversight and support from senior management level.	
CRE-C-02	Business must establish CR responsibilities through appointed CR Managers and/or other individuals whose role profile must –at a minimum- explicitly refer to management of the CR programmes and activities.	
CRE-O-03	Businesses must actively manage and seek to reduce their operational environmental impacts in line with Group targets.	ELR01
CRE-C-03	Business must establish local targets that include: <ul style="list-style-type: none"> <li>• Reduction of CO2 from energy in buildings</li> <li>• Reduction of CO2 from travel related activity</li> <li>• Reduction of the annual amount of water used</li> <li>• Reduction of annual amount of waste</li> <li>• Increase in the proportion of waste recycled.</li> </ul> If the business is unable to set a target, it must provide an explanation that clearly shows that this is due to a core business strategy requirement.	
CRE-C-04	Business must report on: <ul style="list-style-type: none"> <li>• Local environment targets by end of Q1 each year</li> <li>• Provision of qualitative data on the cause of the changes in business environmental impact, and</li> <li>• Any breaches of local regulation.</li> </ul>	
We have publicly reported Group-level targets, some of which are mandatory. The targets have been agreed at a Board level. These targets are: <ul style="list-style-type: none"> <li>• Reduce operational (buildings and travel related) CO2 emissions by 5% on an annual basis,</li> <li>• Reduce operational CO2 emissions by 40% by 2020, and 50% by 2030 – using our restated 2010 baseline</li> <li>• Reduce water consumption by 4% on an annual basis</li> <li>• Reduce total waste by 4% on an annual basis</li> <li>• Increase proportion of waste recycled by 4% annually to a minimum of 80% of total waste produced.</li> </ul> If you require further guidance on how to set local targets you can arrange a briefing on this subject by contacting Group CR.		

CRE-O-04	Controls provide assurance that Aviva Group remains operationally carbon neutral,	ELR01
CRE-C-05	Businesses must budget for, and contribute to, the cost of purchasing carbon credits to offset unavoidable operational carbon emissions on a proportionate basis to the emissions generated.	
<p>The strategic sourcing of carbon offsets in respect of unavoidable operational carbon emission will be done at Group level.</p> <p>Details of the recharges are provided to the Corporate Responsibility Business Partners -or their equivalent- for each business and to Group Finance for the recharge to be included with other recharges to the business.</p>		
CRE-O-05	Businesses must ensure that appropriate due diligence is carried out and that approvals are obtained for all charitable partnerships and donations to ensure alignment to our Group Wide CR Strategy and adequate risk management.	CPB11 ELR11 CPB14
CRE-C-06	All partnerships and donations must fit within our Group Wide CR Strategy.	
CRE-C-07	Business must use due diligence templates provided by Group CR and ensure that due diligence checks are completed for: <ul style="list-style-type: none"> <li>• All charitable partnerships before signature of agreement, and</li> <li>• All donations made outside a charitable partnership.</li> </ul>	
CRE-C-08	All significant partnerships must be submitted to the CR Compliance Panel for advice	
CRE-C-09	A CR Manager or individual with responsibility for CR must sign off any prospective partnerships or donations.	
CRE-C-10	Businesses must not authorise any charitable partnerships or donations that meet any of the following criteria: <ul style="list-style-type: none"> <li>i. With or for individuals. Any donations must always be paid directly into a charitable organisation's account.</li> <li>ii. With or for political organisations.</li> <li>iii. For projects that favour the propagation of a religious belief or where participants/beneficiaries are required to belong to a particular religion.</li> </ul>	
CRE-C-11	Business must use the charitable agreement template provided by Group CR to enter into a partnership. This template must be tailored by the business units to comply with their local legal requirements.	
CRE-C-12	Businesses must refresh their due diligence checks on all significant charitable partnerships at least every three years.	
<p>We aim to make the most of our resources by supporting initiatives in our communities in accordance with our CR Strategy. An exception to this control is £/€plus or similar schemes where Aviva matches or top ups employees individual fundraising efforts. These schemes support employee efforts towards causes they care most about, which in some cases may not directly align to our CR Strategy.</p> <p>Please refer to the glossary for a definition of 'significant partnership'.</p> <p>This contributes to enhance our set of controls to ensure compliance with the UK Bribery Act 2010, which applies to the whole of Aviva plc.</p> <p>Due diligence checks include financial sanctions screenings. Your local financial crime team should be able to support you with the implementation of a process for pre-donation/partnership financial sanctions screenings.</p> <p>The Community Fund model is not required to apply the due diligence templates as provided by Group. This is because equivalent checks are built into the whole assessment process, from submission of projects to awarding of grants.</p> <p>The terms of reference for the CR Compliance Panel and information on membership are maintained by the Group CR Team.</p>		
CRE-O-06	Businesses must accurately report on the data that feeds into our reporting and also communicate their CR efforts at local level.	EMMR39 ELR11
CRE-C-13	Business must report on CR KPIs as follows: <ul style="list-style-type: none"> <li>• On a quarterly/half yearly basis for environment</li> <li>• On a six-monthly basis for all other non-environment data, which includes community and business ethics KPIs</li> <li>• Reporting must be done via the online reporting system</li> <li>• In accordance with the Reporting Criteria.</li> </ul>	
CRE-C-14	A senior person at market level with direct responsibility for delivery of the CR agenda (at least at Director or HoF level) must sign off the data submitted for half year and end of year reporting.	
CRE-C-15	Businesses must communicate internally and externally their CR efforts.	
<p>Aviva reports Group level CR data publicly on an annual basis. Some of this reporting is legally required at market and group level and or assured by our external auditors. In order to support the assurance process, business must provide evidence to support the accuracy of reported data. In the case of the disposal of a business unit, all collecting of data</p>		

and subsequent reporting must continue until completion of sale. Further guidance on this requirement appears at the end of this document.		
CRE-O-07	Business must implement measures to manage risks associated to employee volunteering.	EPSE01
CRE-C-16	Business must implement the Aviva child safeguarding guidance and code of conduct.	
The guidance and code seek to protect the children we support, our staff, charity partners, as well as Aviva's reputation. All employees volunteering with projects that require being in contact with children must read the guidance and code before completing their volunteering assignment.		
ALL-0-01	Each BU must understand the scope of local legal and regulatory requirements, allocate clear responsibilities for compliance and monitor this compliance on an ongoing basis.	CPB47
While the business standards seek to set out the controls and control objectives to mitigate our operational risks, there may be instances where compliance with the standards results in non-compliance with some local laws and regulation. In the event that there is such a discrepancy between the standard and any local law or regulation, such local law or regulation shall prevail and a formal modification to the standard must be put in place.		

## 2.2 "At a glance" summary of matters for escalation to Group

Matter for escalation	Escalation point
1. <b>Application for exceptions</b>	<ul style="list-style-type: none"> <li>Group CR Director</li> </ul>
2. <b>Non compliance with a control or control objective in this Standard</b>	<ul style="list-style-type: none"> <li>As per section 3.2.2.</li> </ul>

## 2.3 References to supporting material

The following business standards and documents relate to this Standard:

- Business ethics code
- Internal Control standard
- Customer experience business standard
- Conduct Risk Policy
- Financial crime business standard
- People business standard
- Procurement and outsourcing business standard
- Supplier code of behaviour
- Child safeguarding guidance and code of conduct.

## 3 Appendix A

### 3.1 Scope of Aviva standards

The scope of the Aviva standards is group-wide. They apply to all Aviva business units, operations, functions, and staff, including but not limited to legal entities (including joint ventures (JVs) and special purpose vehicles (SPVs)), 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 and must ensure appropriate contracts, monitoring frameworks and reporting are in place.

Where Aviva has entered into JV arrangements the management team responsible for oversight of the JV must use all reasonable endeavours to implement the mandatory control objectives and controls in this standard into the JV arrangements. Where this is not possible, the management team responsible for oversight must apply for a permanent modification or exception.

### 3.2 Contact details

Questions or comments regarding this Standard should be directed to Sam White, Group Corporate Responsibility & Public Policy Director at sam.white@aviva.com or to Victor Riega, group CR manager, at victor.riega.garcia@aviva.com.

### 3.3 Glossary

Term	Definition
<b>Aviva business ethics code</b>	It provides basic guidance for employees involved in volunteering organised by Aviva and which requires being in contact with children. Some markets also have a CBT on child safeguarding that volunteers must complete before taking part in any volunteering in company time that puts them in contact with children.
<b>Aviva child safeguarding code of conduct</b>	It provides basic guidance for employees involved in volunteering organised by Aviva and which requires being in contact with children. Some markets also have a CBT on child safeguarding that volunteers must complete before taking part in any volunteering in company time that puts them in contact with children.
<b>Carbon neutral / Carbon neutrality</b>	Reducing carbon emissions to zero by energy efficiency, behavioural changes, new low or zero carbon technologies and offsetting remaining emissions so the net effect is zero.
<b>Carbon offsetting</b>	Buying and retiring an emission reduction that has been achieved or will be achieved by a third party. This compensates for emissions which have occurred elsewhere.
<b>Charitable Donation or ‘Donation’</b>	Support voluntarily provided by Aviva to a charitable organisation. Such ‘support’ includes: financial contributions, and donations in kind.
<b>Charitable partnerships</b>	A partnership where Aviva provides money, skills or other resources to a charitable organisation for a set period of time e.g. One year.
<b>Charitable</b>	A written document that establishes –among other things- the identities,

<b>partnership agreement</b>	main rights and obligations of the parties to the relationship, as well as any other information necessary for the successful launch, execution, evaluation and closing of a project supported by Aviva as part of its Community Investment programmes.
<b>Charity/Charitable organisation</b>	Any organisation which is established for charitable, benevolent, philanthropic purposes or a body that exists for the public good. It includes: <ul style="list-style-type: none"> <li>- Organisations registered as a charity with a charity regulator (e.g. In the UK the Charity Commission)</li> <li>- Non-Governmental Organisations (national and international)</li> <li>- Non-for-profit associations</li> <li>- Think tanks</li> <li>- United Nations Bodies - e.g. Office of the High Commissioner for Human Rights</li> <li>- Schools and Universities</li> <li>- Government agencies.</li> </ul> This list is not restrictive.
<b>Climate change</b>	Changes in temperature, rainfall and other aspects of climate, with potentially disastrous effects for many people. Partly natural and partly anthropogenic (i.e. man-made) The latest scientific report advises that anthropogenic climate change is responsible for the increases in the rate of current and future climate changes (IPCC4).
<b>CO2</b>	Carbon dioxide – the most common of the greenhouse gases – which causes the atmosphere to warm.
<b>Commercial Sponsorship</b>	When Aviva -as sponsor- contractually provides financing or other support in order to establish a positive association between the sponsor's image, identity, brand, products or services and a sponsored event, organisation, activity or an individual. It is carried out to <b>gain marketing and promotional benefits.</b>
<b>Community Investment</b>	A specific voluntary engagement with charitable organisations and which that extends beyond the company's core business activities. The types of support that companies provide to these organisations can vary considerably from one-off donations to good causes, and employee volunteering during work time, to sustained long-term partnerships with charitable organisations that address a number of core issues of importance to both the companies and the communities where they operate.
<b>CR Compliance Panel</b>	The Panel support local markets planning to enter into a significant partnership by advising on the due diligence checks performed, as well as other considerations around risk and governance.
<b>Due diligence check</b>	The process through which a local business researches a charity's reputational, financial and organisational health and its capacity to successfully manage a charitable project. It also refers to the written document that contains the information provided by the charity and that proactively sought for by the local business.
<b>Employees</b>	Aviva permanent employees, which includes full time and part time employees, and fixed-term contractors.
<b>Financial sanctions screening</b>	Due to the Counter Terrorism Act 2008 and Terrorist asset Freezing Act of 2010 (applicable to Aviva Group and therefore its offices abroad) it is illegal to provide funds or financial services to any individual or entity named on a UN Sanctions list without the provision of a license from HMT. In order to avoid non compliance with such legislation Aviva endeavours to screen all customers/beneficiaries before doing business

	with them or making services or funds available. In order to avoid non compliance Aviva operates a sanctions screening programme - this is also a minimum requirement of the Financial Crime Standard.
<b>One-off donation</b>	This is a short-term donation for a very specific need. It can be done in cash or in-kind.
<b>Significant Partnership</b>	<p>We consider a partnership to be significant if:</p> <ul style="list-style-type: none"> <li>- Aviva's annual contribution to the partnership is equal to or over £100,000. This figure includes: cash contributions, company donations in kind, and project costs; or</li> <li>- If the business considers the project to be significant. Among other considerations, this could be because the amount to be donated –e.g. £35,000- it is considered a significant investment in the local market or because of the risks involved –e.g. there are significant reputational risks that may be generated by the project.</li> </ul>
<b>UN global compact</b>	<p>The United Nations global compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption. The principles can be found here:</p> <p><a href="http://www.unglobalcompact.org/AboutTheGC/TheTenPrinciples/index.html">http://www.unglobalcompact.org/AboutTheGC/TheTenPrinciples/index.html</a></p>
<b>Volunteering in company time</b>	Any volunteering brokered or facilitated by Aviva and which is done during working hours or where the employee receives time off in lieu. An example of the latter would be where an employee does a half day volunteering during the weekend (employee does not work at the weekends) and the company gives him/her a half day leave in lieu.
<b>Volunteering outside company time</b>	Any volunteering that the employee has committed to do during their own time as a result of encouragement or support from Aviva .

## 4 Appendix B

### 4.1 CRE-O-04-Remaining carbon neutral.

- The strategic sourcing of carbon offsets in respect of unavoidable operational carbon emission will be done at Group level. We purchase carbon credits at a Group level, on behalf of all the Aviva businesses and purchase enough carbon credit to equal our total operational carbon emissions. 1 carbon credit = 1 tonne carbon.
- The costs are recharged to the businesses based on the total amount of carbon emissions arising from each business. The unit cost of per carbon credit is the same for every business. Details of the recharges are provided to the Corporate Responsibility Business Partners -or their equivalent- for each business and to Group Finance for the recharge to be included with other recharges to the business.
- Market CR Business Partners -or their equivalent- are involved in the choice of projects that generate carbon credits to account for our emissions. This process will ensure that Aviva maintains an operational carbon neutral stance.

### 4.2 CRE-O-05-Due diligence, partnership agreements, donations and approvals

- We want to ensure that we are making best use of our resources and supporting initiatives in our communities in accordance with our CR Strategy and that we have an adequate set of controls to ensure compliance with the UK Bribery Act 2010, which applies to the whole of Aviva plc.

#### 4.2.1 Due diligence

- Businesses must conduct due diligence checks on any prospective charitable partner or beneficiary in the case of a donation. However, this does not mean businesses will be required to apply the same level of due diligence for all partnerships regardless of their materiality.
- Group CR provides due diligence templates and offers support for completion of due diligence checks where possible. In the case of donations there is a two tiered approach. For donations under £5,000 a basic due diligence will need to be applied. For donations at or over £5,000 business will have to apply an enhanced due diligence.
- Apart from the donation amounts they apply to, basic due diligence and enhanced due diligence differ in the level of scrutiny they require for each donation.
- Additionally, in accordance with the Financial Crime Business Standard, business must screen the organisation receiving any donations, regardless of their amount, against a financial sanctions list. Donations must not be made unless a financial sanctions screening has taken place. Further details and guidance regarding financial sanctions screening appear as an annex to the due diligence templates.
- Due diligence checks can be completed through online desk search. Additional guidance on performing due diligence checks is available with the due diligence templates.

#### 4.2.2 Due diligence refreshers

- It is best practice for a company to re-visit key aspects of their due diligence process for significant partnerships at least every three years e.g. by reviewing annual financial reports to consider financial condition, considering the outcome of any independent reviews and checking the current registration status of charities.
- These refreshers will focus only on few key checks. Businesses will not be expected to complete full due diligence checks on the same partnerships annually.

- Group CR will provide specific guidance and templates for due diligence refreshers and will provide support where possible.
- The CR Compliance Panel (The Panel) may review these due diligence refreshers and provide feedback on it.

#### 4.2.3 Donations

- A donation can include cash, or products, or Aviva paying for services that are delivered to the charitable organisation's benefit.
- Donations can be made to a charity with which we have a charitable partnership or to a charity that has no such partnership with Aviva. In the latter case, if the donation is made regularly e.g. every six-months or yearly, business are asked to consider whether they should instead formalise the support provided through a partnership agreement. This assessment should consider: the amounts donated, whether there are links with the organisation that go beyond donations (e.g. volunteering programme), and also risks involved.
- Matching employee fundraising. This includes those schemes where the business matches the amount fundraised by an employee for a charitable organisation up to a maximum annual allowance. The employee is free to choose which charity to support.

#### 4.2.4 CR Compliance Panel and Significant Partnerships

- Significant partnerships are defined in the glossary of this Standard. The CR Compliance Panel (The Panel) will advise on this partnerships before they get final signed off at market level.
- The Panel will mainly focus on whether: the due diligence checks have been completed adequately, and that any material risks have been clearly identified and addressed by the business. The panel's terms of reference are communicated to all CR Business Partners –or their equivalent. They then cascade as appropriate.

#### 4.2.5 Working with religious organisations

- This requirement focuses on the project and access to it by beneficiaries. It is not an upfront prohibition to engage with a charitable organisation that has connection to a particular religion or belief. The rationale behind it is to avoid a situation where Aviva's contribution is seen as supporting a particular religion or belief.
- The prohibition applies if a project's objectives are to support the spread of a particular religion or belief, or if any of the beneficiaries are required, as a condition to benefit from the project, to belong to a particular religion or adherence to a particular belief.

#### 4.2.6 High risk sports

Some examples of high risk sports:

- Board sports: bodyboarding, dirtsurfing, flowboarding, kitesurfing, longboarding, mountainboarding, river surfing, riverboarding, sandboarding, skateboarding, skimboarding, skysurfing, snowboarding, snowskate, street lugging, surfing, wakeboarding, windsurfing.
- Motorsports: drifting, motocross, rallying, snocross, supercross.
- Water sports: coastering, free-diving, jet skiing, scuba diving, waterskiing, whitewater canoeing, whitewater kayaking, whitewater rafting.
- Mountaineering: bouldering, canyoning, free solo climbing, ice climbing, rock climbing, skyrunning

- Free fall: base jumping, bungee jumping, cliff diving, parachuting (skydiving), wingsuit flying
- Flying: air racing, gliding, hang gliding, paragliding, powered paragliding, speed flying
- Others: BMX, extreme skiing, freestyle skiing, inline skating, orienteering, paintball, parkour, powerbocking, slacklining, stunt pogoing, zip-lining.

This is not an exhaustive list.

### 4.3 CRE-O-06- Reporting and communications

#### 4.3.1 Reporting requirements

- Aviva reports Group level CR data publicly on an annual basis. Some of this reporting is legally required at market and Group level and or assured by our external auditors and to support the assurance process.
- Business must provide evidence to support the accuracy of reported data.
- As it has been the case for the past few years, businesses report on data relating to our CR KPIs to Group CR.
- All markets are required to report their data on a quarterly basis (environment data), or in July (for half year) and January (end of year).
- Half year reporting provides a view of progress on all CR KPIs up to the end of June of the reporting year.
- End of year reporting covers all CR KPIs data for the period from 01 January to 31 December of the reporting year.
- Both reporting exercises are completed using our online reporting tool (Credit360).
- In the case of the disposal of a business unit, all collecting of data and subsequent reporting must continue until completion of sale.
- Reporting must be done in accordance with the Reporting Criteria.

#### 4.3.2 CR related communications

- In order to be compliant to national and Group level mandatory regulated reporting requirements, build and maintain trust and pride, businesses must ensure that internal and external communication with stakeholders is open, honest and transparent.
- CR Efforts include all activities undertaken by the business units to deliver their CR plans. Examples of communication for local markets include: publication of the annual CR Report and Annual Report and Accounts, internal communications about how to improve our environmental practices and reduce our environmental impact. At Group level it also includes completion of key investor questionnaires (e.g. FTSE4Good, Dow Jones Sustainability Index-DJSI, etc).
- External communications also include any communications that are for public disclosure, e.g. press releases, updates posted on our external websites, magazines, online forums, social media, Industry events, communications to our shareholders, communication to our customers, etc.

#### 4.4 CRE-O-07- Volunteering and risk controls.

##### 4.4.1 Volunteering activities and employee giving

- Volunteering can be done in company time or outside company time. Please see definitions in the glossary.
- Businesses must support employee volunteering, and in particular those volunteering activities that fit our criteria. However, where an employee wishes to volunteer for a particular charity that does not align to our CR Strategy this should also be supported by the business. Our aim is to encourage employee volunteering in general, not just volunteering with our current charity partners.
- All volunteering must be done for a charitable organisation.
- Businesses should actively encourage employees' participation in their charitable giving and community activities, providing paid employee volunteering leave during company time. We recommend the provision of at least three days paid volunteering leave.
- Charitable partnerships should ideally offer opportunities for Aviva people to 'get involved' through a variety of volunteering and fundraising activities that maximise the genuine impact we have.
- Businesses are also encouraged to consider other opportunities for supporting employees' good will and support for the community – including:
  - Offering an employee payroll giving scheme – whereby employees can donate directly to charity from their salary
  - Match-funding employee fundraising activities
  - Offering an employee award scheme whereby employees can apply for funds to support a charity/community Group of their choice.
- Businesses guidance should be provided about which causes / bodies are appropriate for such activity.
- Ideally, businesses should demonstrate partnership, by helping relevant charitable organisations to deliver long-term goals (rather than single events or milestones).

##### 4.4.2 Child safeguarding guidance and code

- The guidance and code seek to: a) ensure that children with whom we work in Aviva are offered a safe and protective environment during their contact with us or our partners; b) provide Aviva staff, volunteers, or anyone else working for, or on behalf of Aviva or an Aviva partner with guidance on procedures they should adopt at all times when in contact with children in the context of a volunteering activity organised by Aviva, especially in the event that they suspect a child may be experiencing, or be at risk of harm or are approached by a child with such concerns.; c) provide a model of good working practice for charitable partners who we expect to have their own best practice guidelines, if applicable; d) help Aviva play its part in creating child safe environments; e) safeguard staff and representatives from allegations of misconduct or abuse.