

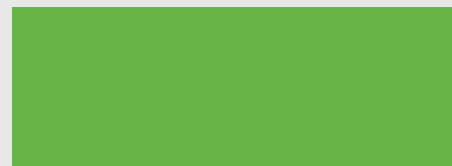
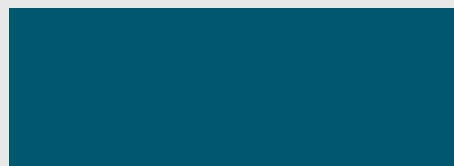
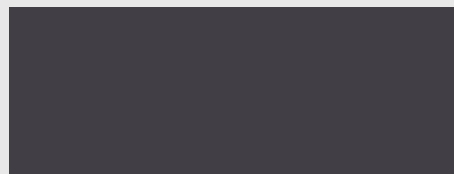
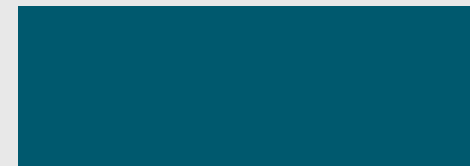
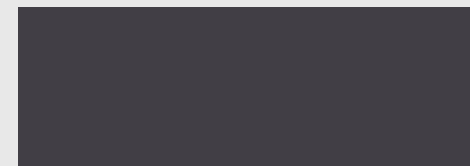
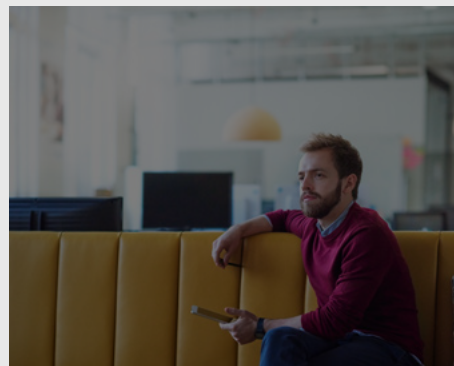
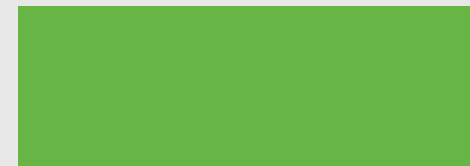
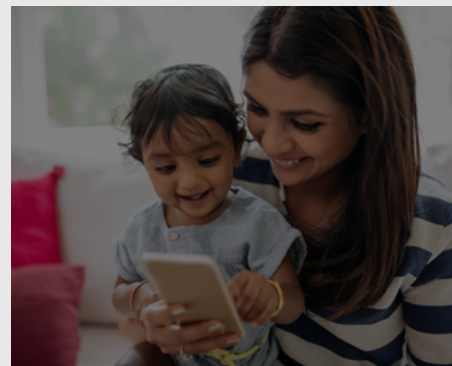
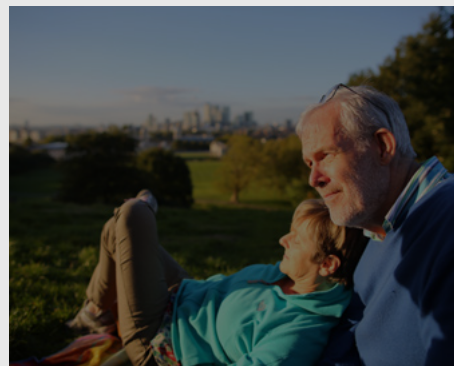


The Aviva Modern Slavery Act Transparency Statement 2020

In line with the requirements of the Modern Slavery Act 2015 (the “Act”), this statement outlines the steps Aviva plc (‘The Group’ or ‘We’) has taken during the financial year ending 31 December 2020 to prevent any form of modern slavery from occurring within our business operations and supply chain.

Our purpose at Aviva is to be ‘with you today for a better tomorrow’. Acting responsibly is vital to achieving that purpose. Doing the right thing is essential for our customers, our people and our business. Our work to tackle modern slavery and human trafficking is fundamental to this and to our wider approach to respecting human rights.

Modern Slavery, forced or compulsory labour, servitude and human trafficking are severe violations of fundamental human rights and freedoms. In line with Aviva’s values and principles detailed in ‘the Aviva Business Ethics Code 2020’, we are committed to contributing to the eradication of modern slavery. The ongoing Coronavirus pandemic requires businesses to be extra vigilant and during 2020 we have continued to improve our approach to addressing the risks of modern slavery.



Our organisation

The Aviva Group

We are a leading Savings, Retirement and Insurance business, helping our 31.6 million customers make the most out of life, plan for the future, and have confidence that if things go wrong we will be with them to put it right. We operate through businesses in our core markets of the UK, Ireland and Canada and our other international businesses, which are managed for long-term shareholder value.



UK & Ireland
Savings and retirement, protection, health annuities and equity release products



UK & Ireland General Insurance
We protect homes, cars and holidays; we insure businesses and flooding and cybercrime



Canada
We protect cars, homes and businesses



Aviva Investors
We bring broad and deep asset management expertise across all major asset classes



Continental Europe
Our businesses in France, Italy, Poland and Turkey offer insurance, savings, investments and protection products



Asia
We operate in China, Vietnam and Singapore

In the UK we are one of the largest insurers and the number one provider of workplace pensions. We have over 16,000 UK employees, working across different locations including London, Norwich, Bristol, Manchester, York, Perth, Sheffield, Birmingham, and Glasgow and over 29,000 globally. Our customers can interact with us in several ways: online, by phone, through brokers, financial advisers, strategic partners and price comparison websites.

More info about our business can be found [here](#).





The table below summarises our global business footprint:

Market	Contribution to 2019 Group operating profit (£m)	% of employees (Group total)	% of managed suppliers (Group total)
United Kingdom ²	2,095	53	46%
Ireland	25	5	5%
Canada	287	14	12%
Aviva Investors ³	85	5	13%
France	467	13	7%
Poland ⁴	196	6	3%
Italy	298	2	8%
Other ⁵	38	0	n/a
Asia discontinued operations ⁶	312	1	3%
Other Group activities	(642)	1	n/a
Total	3,161	100	100

Globally we work with over 2,000 suppliers across the various countries in which we operate to procure products and services for Aviva and for our customers. We also outsource a range of operational functions and activities including asset management, policy administration, claims handling, finance and IT. Our service providers are predominantly based in the UK but also in France, Italy, Canada, China, Singapore, India and Sri Lanka.

Additional details of our business, operations and supply chain can be found in our **Annual Report and Accounts 2020**.

¹ Group adjusted operating profit is an alternative performance measure (APM) which is used by the Group to supplement the required disclosures under IFRS (International Financial Reporting Standards) Please refer to note B in the 'Accounting Policies' section and to the 'Other Information' section within the Annual Report and Accounts for further information

² The main entities within the scope of the UK Modern Slavery Act 2015 sit in our United Kingdom and Aviva Investors markets, however we adopt a group-wide approach to human rights and tackling modern slavery as described in this statement and in **The Aviva Human Rights Policy**.

³ Includes operations in the UK, Canada, Ireland, Poland, Singapore, United States, Australia, Luxembourg, Germany, Netherlands, Italy, Finland, Solus (London) Limited and Sesame Limited.

⁴ Includes Lithuania for contribution to 2020 Group adjusted operating profit and percentage of employees.

⁵ Other includes Turkey, China, India and our 26% shareholding in Aviva Sing Life.

⁶ At 31 December 2020, FPI, Aviva Singapore, Hong Kong, Indonesia and Vietnam are classified as discontinued operations.

Our approach

As stated in the **Aviva Human Rights Policy 2020**, we are fully committed to respecting human rights, ensuring we do not infringe the rights of others and tackling any risk or instance of modern slavery within our operations and supply chain, as set out in the United Nations Guiding Principles on Business and Human Rights (UNGPs).

We fully support the principles of the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and we are determined to act in alignment with the guidance of the UNGPs. We are also a signatory of the United Nations Global Compact and report annually against their ten Principles.





Scope of our work

We recognise that the risk of modern slavery occurs across our businesses, in the UK and in all other markets where Aviva operates. Our approach aims to go beyond the basic requirements of the Act and includes majority owned Aviva businesses outside of the UK and we seek opportunities to influence others in this area. In 2020 we continued to review specific modern slavery risks in the UK, Canada, Ireland, Italy, Poland and Singapore and monitored our wider human rights risk across all the countries we operate in.

During 2020 we refreshed our human rights and anti-modern slavery action plan for 2020-2021, based on the findings of the human rights due diligence carried out across all our markets (including joint ventures) in 2019, and established best practice models and maturity indexes, to focus our work in our markets and functions.

When it comes to our suppliers, we have focused on those that directly provide Aviva with goods or services, specifically those suppliers that are actively managed by the business, including the suppliers that represent Aviva's highest commercial risk and/or most significant expenditure. The Aviva markets included in scope of this statement have established criteria to identify which suppliers should be actively managed. This includes considerations such as: potential regulatory impact, spend and whether they provide services on behalf of Aviva.

We understand that the risk of modern slavery is also present within our sub-suppliers. In some cases, the risks within these suppliers may be higher. In 2020 we have focused our efforts on a few key sub-suppliers as the Coronavirus pandemic has limited our access to this network. However, we will continue our efforts to include these sub-suppliers in our action plan for 2021 together with assessing suppliers across all markets by the end of 2021.

Our policies and standards

We recognise that strong governance and clear policies are crucial to help us promote human rights and tackle related violations of those rights, including modern slavery and human trafficking. We believe that our employees, customers, suppliers and the people touched by our business must all be treated with dignity, fairness and respect.

Our Policies are guided by internationally recognised human rights standards⁷. We regularly assess our Policies and Standards to ensure their effectiveness.

Our Human Rights Policy has been refreshed this year to reflect key developments in the human rights agenda. The Policy defines Aviva's commitment to human rights including, but not limited to, the prevention of modern slavery and the provision of remediation⁸ when necessary, in our operations and supply chains. This Policy has been developed in consultation with internal stakeholders and external experts on international law and human rights. It identifies our main stakeholders, as well as the most salient human rights issues for our business. Stakeholders and Policy areas include:

- Our Employees and their right to be treated equally and their freedom of association;
- Our Customers and their right to be treated fairly which includes protection of their privacy;
- Responsible investment and how we interact with companies we invest in to highlight human rights issues, including modern slavery issues; and
- Our Speak Up helpline to report any unethical behaviour including any potential human rights violations.
- Our Suppliers and paying the Living Wage: we ensure that suppliers pay at least the real Living Wage to eligible employees that are subcontracted to Aviva in the UK and in 2020 we also signed up to the Living Hours scheme

For more info please access our Aviva Human Rights Policy 2020 [here](#).

⁷Including but not limited to the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organisation's Declaration on fundamental Principles and Rights at work, International Labour Organisation Conventions, 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.

⁸In line with the Remedy pillar of the United Nations Guiding Principles business have the responsibility to prevent and remediate to any adverse human rights impacts they cause or to which they contribute. Remediation refers to both providing remediation for causing or contributing to cause a negative human rights impact or turning a negative impact into a positive one. More information on the Remedy Pillar of the United Nations Guiding Principles and its applicability: https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf

The Aviva Business Ethics Code, which was also revisited in 2020 outlines the minimum standards of ethical behaviour required at Aviva and guides us to act responsibly and transparently. Our new Code has a wider reference to human rights and modern slavery and the expectations we have of our suppliers. This includes their use of our Speak Up helpline to raise any potential human rights abuses and violations, including cases of forced labour, child labour and any form of modern slavery; discrimination in our business or supply chain; and cases of questionable behaviour related to our suppliers and partners. Our employees are required to read, understand and accept and adhere to the Code each year. We take this very seriously – anyone who does not do so may have any annual bonus withheld or face disciplinary action. We track and report externally on the percentage of employees who sign up to our Code every year and we share the Code with our suppliers as part of our Aviva Third party Code of Business Behaviour.

Aviva Third Party Code of Business Behaviour We expect our suppliers to adhere to and act in alignment with the high standards of business behaviour contained in our Aviva Third Party Code of Behaviour. We updated our Code in 2020, enhancing the sections on human rights and labour rights, asking our suppliers to act in alignment with the provisions of the United Nations Universal Declaration of Human Rights and the ILO core labour standards, and to prevent modern slavery, child labour, forced labour, and provide remedies should any human rights violations occur.

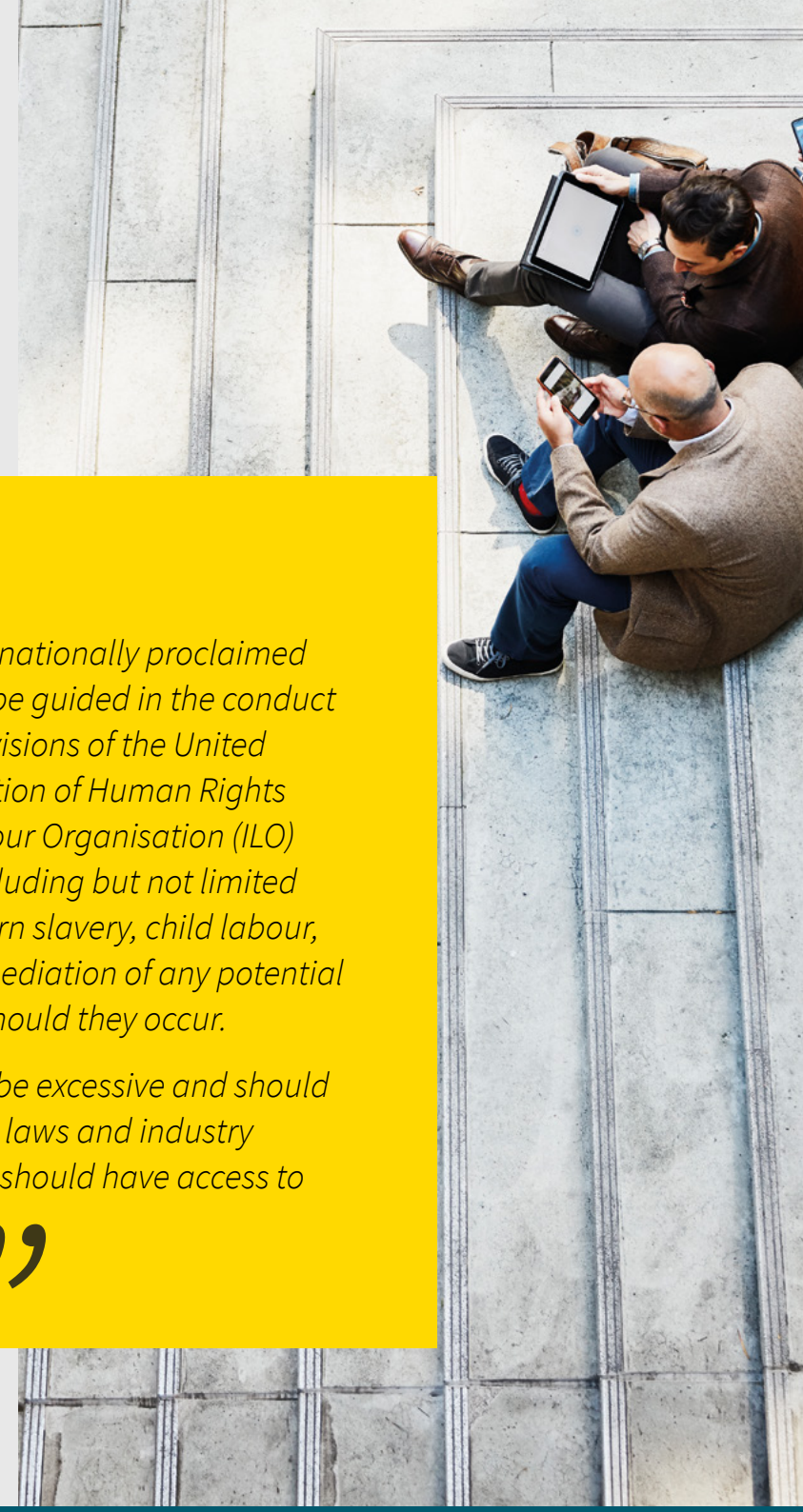
The Code refers to our joint responsibility to respect human rights, including children's rights and references specifically modern slavery, forced labour and the prohibition of excessive working hours:

“

We should respect all internationally proclaimed human rights and should be guided in the conduct of our business by the provisions of the United Nations Universal Declaration of Human Rights and the International Labour Organisation (ILO) core labour standards, including but not limited to, the prevention of modern slavery, child labour, forced labour, and the remediation of any potential human rights violations, should they occur.

Working hours should not be excessive and should comply with all applicable laws and industry standards and employees should have access to fair working conditions.

”



Our reporting mechanisms

We clearly communicate how our employees, business partners, suppliers and third parties can raise any concerns regarding unethical conduct, including modern slavery related risks or issues. These can be raised via the following channels:

Speak Up: which includes a confidential independent reporting service, accessible 24/7. Guidance on what should be reported via Speak Up is included in **The Aviva Business Ethics Code**.

Useful information on how to report concerns and what to report is also available on our intranet and in Aviva's offices via posters, information boards and internal video screens. As detailed in the Aviva Business Ethics Code 2020, concerns can be raised via: **website**, Telephone for each business location⁹ or via email as well as by contacting our **Corporate Responsibility Team directly**.

For more info on our reporting mechanisms please see The Aviva Business Ethics Code 2020.

⁹ Canada 1855 223 2807; France 0800 918 479; Hong Kong 800 908 589; Ireland (Eire) 1800 806 186; Italy 800 797 552; Singapore 800 4411 140; UK 0800 915 4043; Vietnam 120 11527, India 000 800 440 1286



Our approach to risk management and due diligence



As a provider of insurance and asset management services, we have evaluated our risk of modern slavery risk to be low. This is because insurance has not been identified as a key risk sector by current external, publicly available research and almost all our employees work in roles that are low risk e.g. office-based roles, and include roles that require specialist qualifications e.g. accountancy, actuarial, procurement, human resources. This low risk rating was also confirmed by an independent assessment that we commissioned from The Slave Free Alliance on Aviva plc in 2018.¹⁰

We consider that our risks are most likely to be found in our supply chain. Areas in our supply chain identified as relatively high-risk include cleaning, catering and car valeting. We have added new medium risk areas during 2020 as we extend our risk assessment scope. These include manufacturers we buy from, outsourcers (e.g. call centre suppliers), some facilities management providers e.g. office furniture, electrical maintenance, printing services and warehousing. Based on this new risk assessment and discussions with the Procurement and supply chain team, we have identified key suppliers to conduct threat assessments with during 2020. These assessments are

based on combined internal expertise, data from our Procurement systems and teams and publicly available research about high risk sectors and activities. We continue to review and assess our modern slavery risk across the business. We commit to act upon any potential risks identified and any risks will be addressed in our local and groupwide human rights action plans in 2021.

Aviva recognises that insurance companies can also use their influence to support efforts to prevent and mitigate human rights violations in their business relationships with corporate customers. We therefore support efforts to prevent and mitigate human rights violations in business relationships with customers, suppliers and third parties. We maintain group-wide procedures for due diligence of customers, employees, suppliers, intermediaries and other third parties that we do business with to ensure that we know who we are dealing with and that these relationships align to our risk appetite and values. These procedures include risk-based background screening that, amongst other things, is designed to identify any known involvement in modern slavery, people trafficking or other human rights abuse.

¹⁰We engaged the Slave Free Alliance (SFA) in 2018 to perform an independent review of Aviva's work on modern slavery. The SFA is managed by Hope for Justice, a charity with extensive independent expertise in this area. For more details on this please consult of 2018 modern slavery statement on Aviva.com

Our approach in action

What is our approach to recruitment?

In the UK, we continuously manage the risk of modern slavery and related labour rights violations by ensuring that the people we hire have the right to work and that their basic rights as workers are protected. We work with reliable third-party service providers to conduct pre-employment checks. Pre-employment screening and prevention of illegal working policies help us ensure that anyone recruited to work for Aviva in the UK has the right to do so. We perform Criminal Record Checks as part of our pre-employment screening process. Prior to starting employment, each new joiner will be issued with a contract of employment which confirms they will be contracted to work either a standard or non-standard working pattern with “standard” working hours. Standard working hours are set out in our contracts of employment as 1,827 hours annually for a full-time person which is an average of 35 hours per week. This is explained in our Working Patterns Policy which is also available on our Intranet. Markets outside of the UK establish their own pre-employment checks and working patterns, always abiding by local legislation.

What is our approach to group wide due diligence?

In 2019 we engaged with all our markets (wholly owned and joint-ventures) to conduct human rights due diligence, specifically including modern slavery risks. The due diligence covered our governance, supply chain, our customers, investments and our people¹¹. In 2020, after having analysed the output of this exercise, we have put together an action plan for all markets, having identified any relative weaknesses to address or strengths to further enhance. We have already implemented many actions within the plan and will work with business leadership across the group to complete these actions, including strengthening our anti-modern slavery agenda, raising awareness at all levels of the business and embedding our approach to supplier due diligence across all markets. We have also continued to build wider human rights and modern slavery awareness by deploying a comprehensive Business and Human Rights e-learning module with emphasis on modern slavery. This will also be shared with some of our key suppliers undergoing a modern slavery risk assessment.

¹¹ This exercise was as a result of the suggestions offered by Slave Alliance during the Aviva plc threat assessment consultation in 2018



What is our approach to modern slavery risk in our supply chain?

As set out above, we assessed that our highest risk sits within Aviva's supply chain. We expect our suppliers to forbid any form of modern slavery or forced labour and continue to work together with them to this end as prescribed both by our Aviva Business Ethics Code 2020 and Aviva Third Party Code of Business Behaviour 2020. We continue to screen suppliers at the onboarding phase and as part of the payment process. This screening is currently used to check for sanctions violations.

Our Procurement teams work with our suppliers and request them to agree to the Aviva Third Party Business Code of Business Behaviour. When responding to a request for a proposal in the UK we ask our suppliers to agree that our standard clauses on human rights and modern slavery be included in any contract. These clauses have now been revised to include reference to the UNGPs remedy pillar, and all markets have been provided with guidance on local laws or internationally recognised standards that they can use.

Expectations from our suppliers include:

- Paying eligible employees, no less than the real Living Wage in respect of work provided to Aviva at our premises in the UK;
- Commitment to replying to the relevant anti-slavery and human trafficking questions within Aviva's supplier due diligence questionnaires;
- Commitment to implement due diligence procedures for its own suppliers, subcontractors and other participants in its supply chain in relation to services provided to Aviva to ensure that there is no slavery or human trafficking in their supply chain;
- Providing training on modern slavery for relevant employees (e.g. those that are responsible for the recruitment of staff and/or the procurement of goods and services);
- Requirement to notify Aviva as soon as it becomes aware of a case or potential case of modern slavery in its supply chain; and
- No Zero Hours Contracts; unless the employee or worker has provided his or her positive, expressed consent to enter such a contract and the supplier (or its sub-contractor) can, on request, provide to Aviva written evidence of such employee or worker's consent.

We request new suppliers to notify Aviva if they are required to comply with the UK Modern Slavery Act 2015, and if so, to provide confirmation that they have published a modern slavery statement. As per the commitment made in our Modern Slavery Statement 2019, we have now completed checks on a random sample of suppliers to assess compliance with the Modern Slavery Act's requirements. We were pleased to find that those suppliers were fully compliant with the Act and only one needed further guidance from Aviva¹². We have also obtained confirmation from our main facilities management, security and catering suppliers that their employees working at Aviva premises are paid at least the real Living Wage.

¹² In one case we asked the supplier manager owning that specific supplier relationship to suggest the supplier to move their Modern slavery statement to a prominent place in the company site, as per Home office requirements, as it was difficult for us to locate it.



Supplier assessments

In 2020, seventeen (17) assessments including four (4) self-assessment questionnaires, one (1) independently run ethical audit (based on a recognised methodology and aligned with the ILO principles), two via accessing third party independently run ethical audits (2) and ten (10) remotely run supplier assessments were completed. These assessments covered areas such as modern slavery, child labour, labour rights, Health and Safety, Freedom of Association and the Right to Collective Bargaining, discrimination and working hours in alignment with existing established standards (e.g. SA8000 and the ILO principles)¹³.

In line with the commitment made in our 2019 statement we have also assessed the performances of two key high-risk tier 2¹⁴ suppliers both based in Eastern Europe. Due to the Coronavirus pandemic we could not conduct these assessments ourselves and therefore we have worked in collaboration with our tier 1¹⁵ supplier, who had conducted various audits

and due diligence on these suppliers to assess their profile. Our assessments were completed by our Group CR function, working jointly with our Procurement and category managers, Compliance and wider related functions. The sectors covered were catering, marketing, merchandising, manufacturing, financial services outsourcing, facilities management, office furniture suppliers, electrical maintenance, printing services and print warehousing and outsourced call centre suppliers. These were based in the UK, Singapore, Sri Lanka/ India, Italy, Canada and Poland.

The suppliers were selected based on spend and sector risk, and while one supplier received an independent ethical audit conducted remotely, all the remaining supplier assessments were conducted in-house and remotely. The assessment was based on a desktop approach whereby suppliers' existing documentation¹⁶ was assessed to obtain key data on their approach. We then provided the suppliers with improvement plans and suggestions and we are now tracking their progress.

Recommendations we have shared with our suppliers:

Although we did not find any instances of modern slavery, we identified opportunities for improvements including:

- Offering suppliers and their employees access to our comprehensive business and human rights and modern slavery training
- Asking them to consider developing a standalone human rights policy
- In some cases, completing supplier risk checks, to strengthen or add specific reference to modern slavery and human rights indicators (e.g. checking that employees do not share the same address or bank account, etc.)
- Introducing them to Aviva's approach to Living Hours and asking them to consider adhering to it.

Some best practice we have identified:

- Being members of ethical trading and sustainability organisations
- UK employers having signed up to the real Living Wage Scheme
- Overall good practice in place when it comes to modern slavery for small businesses
- Having a dedicated Health and Safety representative
- Willingness to undertake Aviva business and human rights and modern slavery training
- The presence of robust Codes of Conduct

¹³These assessments were developed by our CR Manager who received specific training as a Lead SGS social systems lead auditor; providing the main skills and knowledge required to audit social systems under SA 8000 requirements. The assessments were finalised capturing invaluable insights from our Group Procurement team.

¹⁴Tier 2 suppliers are the key suppliers to tier 1 companies in the same supply chain.

¹⁵Tier 1 suppliers are companies that supply parts, products or services directly to another company. They usually supply key product or services to a client company.

¹⁶This included but was not limited to suppliers' policies, standards, MSA statements, internal risk systems and process details, employee handbook and any other externally shareable documentation



A case study

Our approach to investigating a concern raised by one of our overseas suppliers

In April 2020 we received an anonymous email raising concerns relating to an overseas outsourced service provider. The anonymous email was sent by an individual who claimed to be a worker at our supplier's facility and highlighted specific allegations of long working hours and unachievable targets being set by management during the Coronavirus pandemic.

We responded by immediately organising a working group where the CR function worked together with the Risk, Procurement and Supply Chain, Legal and Group Investigation functions. Ensuring that we protected the source, we liaised with the supplier and requested clear evidence of working policies and practices with reference to the allegations. We received strong assurances and management information from the supplier but to be robust in our review we chose to conduct an independent third-party tailored¹⁷

ethical audit. The ethical audit, which was based on recognised frameworks¹⁸ conducted remotely to maintain the safety of all involved given the Coronavirus pandemic. It was conducted by an auditor based in the UK with a knowledge of the local context and the local legislation and lasted three full days.

The audit found no critical issues related to modern slavery, however it provided the supplier with a full corrective action plan to improve its approach. Aviva is still working with this supplier to make sure that the improvements are made and that this supplier upholds the principles described both in our Aviva Business Ethics Code and our Third-party Code of Behaviour. Aviva Procurement and Supplier Management also used this opportunity to communicate the need for increased vigilance and dialogue with similar suppliers given the potential human impact of the Coronavirus pandemic.

¹⁷ The audit firm chosen was briefed and Aviva also provided key insights to address specific issues and tailor their audit template.

¹⁸ The audit was based on the principles behind the SMETA Audit /SA8000 Standard methodology also aligned with the conventions of the International Labour Organisation.



How has our approach evolved from being a ‘Living Wage’ employer to becoming a ‘Living Hours’ employer in 2020?

Aviva is a principal partner and long-term supporter of the Living Wage Foundation. Since 2014, we have been a Living Wage employer. Our Living Wage commitment means that all our employees, and eligible on-site third-party colleagues, in the UK are paid at least the real Living Wage, a wage that is based on the real cost of living.

However, it has become clear that in-work poverty is still an issue for too many people and that this is not resolved solely by pay rates. We recognise that in order to provide financial certainty a living wage needs to be accompanied by sufficient regular working hours for people to be able to budget effectively and to make ends meet. In response to this, the Living Wage Foundation has developed a new ‘Living Hours’ standard, aimed at reducing the pressures of constant uncertainty over hours and pay by encouraging

employers to provide workers with security of hours alongside a real Living Wage.

In October 2020 Aviva became one of the first two UK organisations to receive accreditation as a Living Hours employer and, as such, we are committed to ensuring that 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.

Following our recent accreditation, we will continue to support and promote the Living Hours standard and to encourage other organisations to apply for accreditation. Over the coming months, we will work with key suppliers to understand how we can extend the Living Hours measures to apply to supplier’s employees working on our sites, as well as to our own employees.

For more information on our approach to becoming a ‘Living Hours’ employer please visit our update on [Aviva.com](https://www.aviva.com)

Our role as responsible investor

As a founding signatory to the UNPRI (United Nations Principles for Responsible Investment) we recognise and embrace our duty to act as responsible long-term stewards of our clients' assets. We integrate environmental, social and governance (ESG) issues, including human rights issues and modern slavery, into our investment analysis and decisions across asset classes. We use our influence as a large asset manager to engage with the companies we invest in to drive positive change in their behaviour. We do this through research and active ownership, exclusions and driving industry change.

Below are examples of some of our investment actions on human rights including modern slavery:

- We support and use the Corporate Human Rights Benchmark (CHRB), which we helped found in 2013, to assess companies' performance on how they embed human rights, including tackling modern slavery. We include the CHRB results in our ESG research and voting policy to ensure we hold companies that scored poorly accountable at their Annual General Meeting (AGM). In 2019 we voted against 32 companies and we were pleased to see that 23 of these have improved. In 2020 we have voted against [97] companies. We also worked with the Investor Alliance for Human Rights to send an investor statement to all companies scoring 0 on all human rights due diligence indicators, representing over US\$4.5 trillion in assets under management.
- To help ensure FTSE350 companies are meeting minimum requirements within the Modern Slavery act we supported the Business and Human Rights Resource Centre and other collaborators such as Rathbones to identify a list of 38 companies who have failed to meet the minimum reporting standards of the Act. We have written to these firms requesting compliance.
- We are also working with the charity fund manager CCLA and a group of investors on the "Find it, Fix it, Prevent it" project which goes beyond minimum compliance of the law and instead focuses on how companies are working to tackle modern slavery in their operations.
- Aviva Investors 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.





Our governance

Senior Managers and Executive Sponsors

The Group General Counsel and Company Secretary and the Group Chief Operations Officer are active co-sponsors of our work on human rights and modern slavery; approving plans and reviewing progress. They also help to provide visibility of the issue at the Executive Committee level, remove barriers to implementation and represent the agenda in external stakeholder engagements (e.g. with other businesses within the United Nations Global Compact and on the UK Home Office's Business against slavery forum). Procurement, Corporate Responsibility and Public Policy senior management review progress against the action plan regularly, ensuring it is resourced appropriately and the implementation is well aligned with corporate priorities, and to sign off specific actions from the plan as appropriate.

Cross-functional working group

In 2020 we have revised the membership of our business wide working group, now called the Human Rights and Anti-Modern Slavery Working Group, with representatives from Corporate Responsibility, Procurement, Supplier Management, Company Secretarial, Legal and our People (HR) function. Aviva Investors also provide their expert view when required. This group continues to lead the design and implementation of the 2020-2021 Human Rights and Modern Slavery Action Plan which we refreshed and strengthened in 2020. This group supports key activities including policy improvements and development, enhancing supplier approach to Modern Slavery, providing advice on employee training and supporting both the training and assessment of suppliers. The working group supported the drafting of this statement and supports wider communications with senior management and employee groups, as well as ensuring detailed progress against our commitments.

Subsidiary boards

The boards of the Aviva entities identified within scope¹⁹ review and approve the information disclosed in this statement.

Board Customer, Conduct and Reputation Committee

This Committee's role is to assist the Board in shaping the culture and ethical values of the Group through overseeing and advising on customer, conduct, reputation and community matters. All Committee members are independent Non-Executive Directors. The Committee reviews the Human Rights and Modern Slavery action plan, The Aviva Business Ethics Code 2020 and related documents and papers, receives timely updates on progress against the plan and reviews and approves the Aviva Modern Slavery statement before final submission to the Board of Aviva plc. More information is available [here](#).

Aviva plc Board²⁰

The Board assesses and approves this statement. Our Group CEO signs the statement on behalf of Aviva plc.

¹⁹ The Aviva entities within the scope of "the Act" are: Aviva Insurance Limited, Aviva plc, Aviva Central Services UK Limited, Aviva Employment Services Limited, Aviva Equity Release UK Limited, Aviva Group Holdings Limited, Aviva Health UK Limited, Aviva Investors Global Services Limited, Aviva International Insurance Limited, Aviva Investors UK Fund Services Limited, Aviva Life Holdings UK Limited, Aviva Life & Pensions UK Limited, Aviva Life Services UK Limited, Aviva UK Digital Ltd, Friends Life Holdings plc, General Accident plc, Gresham Insurance Company Limited

²⁰ More information on our Board and business leaders is available [here](#)



Our training and communication

At the heart of any policy and process are our people and we communicate with them to raise awareness of our work on modern slavery so that they can understand, promote and cascade it further within our organisation.

Modern slavery training for Markets and Functions:²¹ Working together with our partner the Slave Free Alliance, Corporate Responsibility has created a comprehensive e-learning module to help our colleagues understand the link between business and human rights and to raise awareness around modern slavery, its pervasiveness, the role of corporations and their staff in helping tackle it. This includes the steps Aviva is taking to comply with the requirement of the UK Modern Slavery Act 2015. This training, available globally to our employees, is aimed specifically at employees at different levels within our business and functions including Corporate Responsibility, Procurement and Supply Chain, Risk, and the People (HR) function (e.g. Recruitment). The training materials address each individual market by providing case studies and dilemmas relating to modern slavery in that market.

²¹ This is part of the work we are doing to meet one of the suggestions resulting from Slave Free Alliance's independent review of Aviva's work on modern slavery, was to develop a more structured, detailed and targeted global training strategy regarding human rights/modern slavery for employees. This is also aligned with what we committed in 2019 as expressed in our previous year statement





On the 10th of December (the date of the 72nd anniversary of the International Declaration on Human Rights) we held a Business and Human Rights and Modern Slavery team building session with markets and functions to support implementation of our 2020-2021 action plan.

Training for suppliers: We have continued to expand the training we provide to higher risk small and medium size suppliers. This year we have worked with our e-learning function to share our comprehensive Business and Human Rights and Modern Slavery training. These included small and medium enterprises who would not have the capability to access training for their employees. We aim to continue this exercise in 2021 to increase supplier capability via training and other targeted initiatives.

Diversity training: We have a Fairness and Equality policy in place which, although not related to slavery and human trafficking issues, does provide employees with detailed guidance about how to treat protected characteristics and demonstrates our inclusiveness as a workplace. It serves to help reinforce our approach to safeguarding the rights of all employees.

Our collaborations and partnerships

We continue to engage with different organisations across the charity, business, academic and public sectors to collaborate and partner on events and projects that advance the anti-slavery cause.



Corporate Human Rights Benchmark:

As a founding partner Aviva continues to support the work of the Corporate Human Rights Benchmark.

UK Government Home Office Business

Against Slavery Forum: We have continued our membership of Business Against Slavery Forum (BASf), a partnership between Government and businesses championing the anti-modern slavery agenda. We have discussed various modern slavery topics with the aim of strengthening our agendas. We are currently working with the Home Office to find a new suitable date to organise an Anti-Slavery Conference dedicated to UK suppliers.

United Nations Global Compact: This year Aviva continued its active membership of the UN Global Compact, playing a key role within the United National Global Compact UK Working Group on Modern Slavery. We have continued our work to peer review participants' modern slavery statements and provided other organisations with feedback on their statements as well as incorporated their feedback in our statement to improve its quality.

UK Living Wage Foundation: Aviva continues to be a principal partner and key supporter of the Living Wage Foundation and continues supporting the Global Living Wage Initiative. As mentioned above, we have now become one of the first accredited Living Hours employers and we look forward to promoting the agenda in 2021.

Slave Free Alliance:²² We continued to work with the Slave Free Alliance and have used their expertise to develop tailored training and to run our team capability building session on Human Rights and Modern Slavery as mentioned in this statement. We plan on working with them in 2021 to further enhance our approach and further develop our supplier capability building activities.

²² The alliance is managed by Hope for Justice, an international charity which aims to end human trafficking and modern slavery.

Our key performance indicators and future plans

We recognise that it is not easy to quantify and measure some of the outcomes and impacts regarding our approach to human rights and efforts to tackle modern slavery, as these are multi-dimensional issues. We are committed to further enhancing our key performance indicators (KPIs). The KPIs below help summarise some of the activities, efforts and progress we made in 2020:

- **Number of cases of modern slavery discovered at Aviva or in our supply chain via our due diligence work and assessments [0]**
- **Number of modern slavery or related complaints actual or alleged raised via formal or informal channels: [1]**
- **Number of speak-up cases related to Modern slavery or related issues: [0]**
- **Number of modern slavery threat assessments conducted on high risk suppliers [17]**
- **Number of independently run tailored ethical audits conducted on key high-risk suppliers [1]**
- **Number of corrective action/improvement plans shared with suppliers which are completed [7]**
- **Number of corrective actions/improvement plans shared with suppliers which are being monitored [10]**
- **Number of markets that underwent a human rights impact assessment [15]**

- **Number of markets provided with an action plan to further improve their approach to human rights [15]**
- **Number of markets who have received anti-modern slavery training: [15]**
- **Number of key employees who were trained on Business and Human Rights and Modern Slavery in 2020: 407**
- **Percentage of UK, Ireland and Canada registered suppliers that have agreed to the supplier Code of Behaviour 99.4%**

As described above, we will continue to develop and improve our approach to respecting human rights and preventing modern slavery. We will do this by learning from our business areas and suppliers on their modern slavery risk management. We will also continue to collaborate and partner with external experts to identify, apply and share best practice in combatting modern slavery. We aim to achieve greater transparency, being open and clear in the way we communicate in our reporting, including our modern slavery statement.

In light of the disruption caused by the Coronavirus pandemic, we have continually reviewed and adapted our approach through the year and will continue to do so in 2021 in order to continue to deliver against our priorities.



Our key priorities and areas of focus for 2021:

- Continue to strengthen our approach to identifying and managing modern slavery risk via human rights' due diligence activity across our business operations and supply chain in all our markets
- Continuously improve our risk and control framework and widen the scope of supplier threat assessments with specific reference to recognised industry frameworks (SA8000 or equivalent)
- Keep conducting and monitoring our markets approach to human rights, ensuring progress is made against established plans
- Explore opportunities to expand and improve our approach to small and medium enterprises (SMEs) and tier 2 suppliers despite the Coronavirus pandemic:
- Expand the scope of how we manage employee risk activity in global markets
- Continue to explore how we can use our influence further to prevent and limit human rights infringements in our business relationships with corporate customers (e.g. via underwriting)
- Continue to monitor that all in scope UK employees working in our premises across the UK have Living Hours (guaranteed minimum hours) contracts
- Continue to roll-out our comprehensive Business and Human Rights and Modern Slavery training to all Aviva Markets
- Continue to build supplier capability, rolling out our training modules as well as through other engagement activities
- Explore the possibility to further assess underwriting related risk and use of pre-screening of clients
- Further explore how we can embed the remedy pillar of the UNGPs as we recognise that this is key for modern slavery victims to receive care and support
- Continue using our influence as a responsible investor to protect human rights and address modern slavery
- Continue to work with expert organisations as well as with likeminded peers to find solutions and share scalable best practice
- Continue to consider the recommendations resulting from the Slave Free Alliance independent assessment report on Aviva plc
- Continue to enhance our anti-modern slavery and human rights related KPIs





Our process and the steps followed to issue this statement

The boards of the Aviva entities identified within scope, as well as the Aviva plc Board have reviewed and approved this statement²³. The Group CEO has signed the statement on behalf of Aviva plc.

A. Blanc

Amanda Blanc

Aviva plc CEO

London, 29/04/2021

²³ A member of Aviva Group CR team, and or a member of our Cospec team (briefed by Group CR team) has provided each of the Boards (including sub-boards and the Board of Aviva Plc) with an update and a brief on this modern slavery statement, answering key questions and incorporating any feedback received prior to obtaining their full approval.